



Shell Chemical Appalachia LLC  
300 Frankfort Rd  
Monaca, PA 15061

March 14, 2023

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. PA-04-00740A was originally issued to Shell on June 18, 2015, authorizing the construction of a “Petrochemicals Complex, Ethylene and Polyethylene Manufacturing” at this location. Shell has since renamed this site as the “Shell Polymers Monaca Site”. Construction of permanent foundations for authorized sources and controls began on February 10, 2016, within 18 months of issuance of PA-04-00740A, and construction has continued without an 18-month lapse. High voltage equipment commenced operation on November 12, 2019 with the remaining emission sources commencing operation in early 2023.

Enclosed, please find the following:

- Plan Approval Extension Form (completed and signed)
- Air Pollution Control Act Compliance Review Supplemental Form (completed and signed)
- Application Fee Check (\$750 made out to Commonwealth of PA)
- Justification for the extension
- Schedule for the completion of the construction

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 J. Kaal", with a long, sweeping horizontal line extending to the right.

Kimberly J. Kaal  
Environmental Manager  
Attorney-in-Fact



## PLAN APPROVAL EXTENSION FORM

Current Plan Approval Information				
Plan Approval No.: 04-00470A		Owner Name: Shell Chemical Appalachia LLC		
Original Issued Date: 6/18/2015		Plant Name: Shell Polymers Monaca Site		
Current Expiration Date: 4/28/2023		Contact Name: Kimberly J. Kaal		
Project Commenced Date: 2/10/2016		Contact Title: Environmental Manager		
Contact Telephone: 724-709-2467		Contact Email: kimberly.kaal@shell.com		
Municipality: Potter & Center Twp		Mailing Address: 300 Frankfort Road		
County: Beaver	City: Monaca	State: PA	Zip Code: 15061	
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
	See attached schedule			
Reason for Extension (see instructions)				
<input checked="" type="checkbox"/> <b>(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).</b>				
<input checked="" type="checkbox"/> <b>(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).</b>				
<input type="checkbox"/> <b>(C) Other (including the extension of the 18-month period specified in 25 Pa. Code §127.13(b)).</b>				
Checklist				
<input checked="" type="checkbox"/> <b>Included Air Quality Fees Schedule</b>				
<input type="checkbox"/> <b>Fees are not required in accordance with 25 Pa. Code § 127.702(i)(3); justification included</b>				
<input checked="" type="checkbox"/> <b>Included justification for the extension request</b>				
<input checked="" type="checkbox"/> <b>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</b>				
<input checked="" type="checkbox"/> <b>Plan Approval Extension Form signed by a responsible official</b>				
Certification of Truth, Accuracy and Completeness				
<p>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.</p>				
Name (Type): Kimberly J. Kaal			Title: Environmental Manager, Attorney-in-Fact	
Name (Signed):			Date: 03/14/2023	



## PLAN APPROVAL EXTENSION FORM INSTRUCTIONS

A plan approval is issued with a term that provides a sufficient and reasonable amount of time to complete the project as described within the plan approval application. Plan Approvals granted by the Department will be valid for a limited time, as specified by the Department in the approval. Except as provided in 25 Pa. Code §§ 127.11a and 127.215 (relating to reactivation of sources; and reactivation), at the end of the time, if the construction, modification, reactivation, or installation has not been completed, a new plan approval application or an extension of the previous approval will be required.

*(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).*

If construction has commenced but cannot be completed before the expiration of this plan approval, an extension of the plan approval must be obtained to continue construction. To allow adequate time for departmental action, a request for the extension shall be submitted at least thirty (30) days prior to the expiration date. The request for an extension shall include a justification for the extension, the specific sources for which the extension of construction or modification is needed, and a schedule for the completion of the construction.

*(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).*

Pursuant to 25 Pa. Code § 127.12b(d), temporary operation of the source(s) is authorized to facilitate the shakedown of sources and air cleaning devices, to permit operations pending the issuance of a permit under 25 Pa. Code Chapter 127, Subchapter F (relating to operating permits) or Subchapter G (relating to Title V operating permits) or to permit the evaluation of the air contaminant aspects of the source.

The permittee may request an extension of the 180-day shakedown period if further evaluation of the air contamination aspects of the source(s) is necessary. The request for an extension shall be submitted to the Department at least thirty (30) days prior to the end of the initial 180-day shakedown period and shall include the specific source(s) for which the extension of temporary operation authorization is needed, a description of the compliance status of the source(s), a detailed schedule for establishing compliance, and the reasons compliance has not been established. This temporary operation period will be valid for a limited time and may be extended for additional limited periods, each not to exceed 180 days.

*(C) Other (including the extension of the 18-month period specified in 25 Pa. Code §127.13(b)).*

If the construction, modification, or installation is not commenced within 18-months of the issuance of the plan approval or if there is more than an 18-month lapse in construction, modification, or installation, a new plan approval application that meets the requirements of Subchapters B, D, and E (relating to plan approval requirements; prevention of significant deterioration of air quality; and new source review) shall be submitted unless it is extended. The Department may extend the 18-month period upon a satisfactory showing that an extension is justified.

Except for the 18-month extension, the Department will publish a notice of its action in the *Pennsylvania Bulletin*. The 18-month extension, if approved, will require the applicant to publish the newspaper notices in accordance with 25 Pa. Code § 127.44 (relating to public notice).

To request a plan approval extension, the applicant shall complete all information as requested in the plan approval extension form and have it signed by a "responsible official" as defined in 25 Pa. Code § 121.1 (relating to definitions). A submission checklist is provided to ensure all required items are included in submitting the plan approval extension form.

The extension fee will not apply if an extension is required through no fault of the applicant. See 25 Pa. Code § 127.702(i)(3). For example, the applicant is waiting for the Department's review of stack test reports, CEM certification, or Department's initial inspection. Please include an explanation of why fees are not applicable along with your justification for the extension, including any relevant submittal dates of reports or applications sent to the Department.



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    08/16/2022

**Type of Submittal**

- |  |   |  |
|--|---|--|
| <input type="checkbox"/> New Plan Approval                     | <input type="checkbox"/> New Operating Permit | <input type="checkbox"/> Renewal of Operating Permit               |
| <input checked="" type="checkbox"/> Extension of Plan Approval | <input type="checkbox"/> Change of Ownership  | <input type="checkbox"/> Periodic Submission<br>(every six months) |
| <input type="checkbox"/> Other _____                           |   |  |

### 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 15601

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.**

- |  |   |                                      |
|--|---|--------------------------------------|
| <input type="checkbox"/> Individual          | <input type="checkbox"/> Fictitious Name  | <input type="checkbox"/> Association |
| <input type="checkbox"/> Municipality        | <input type="checkbox"/> Partnership  | <input type="checkbox"/> Syndicate   |
| <input type="checkbox"/> Proprietorship      | <input type="checkbox"/> Limited Partnership  |                                      |
| <input type="checkbox"/> Public corporation  | <input type="checkbox"/> Government Agency  |                                      |
| <input type="checkbox"/> Private Corporation | <input type="checkbox"/> Joint Venture  |                                      |
| <input type="checkbox"/> Municipal Authority | <input checked="" type="checkbox"/> Other Type of Business (specify) <u>Limited Liability Company</u> |                                      |

**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.

<b>Unit Name</b>	<b>Principal Places of Business</b>	<b>State of Incorporation</b>	<b>Taxpayer ID</b>	<b>Relationship to Applicant</b>
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.

<b>Unit Name</b>	<b>Street Business</b>	<b>County and Municipality</b>	<b>Telephone No.</b>	<b>Relationship to Applicant</b>
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
William Watson General Manager, Shell Chemical Appalachia LLC	Shell Chemical Appalachia LLC 300 Frankfort Road Monaca, PA 15061
Kimberly Kaal Environmental Manager / Attorney-in-Fact Shell Chemical Appalachia LLC	Shell Chemical Appalachia LLC 300 Frankfort Road Monaca, PA 15061
(No additional changes)	

**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 Operating Permit Number	Location	Issuance Date	Expiration 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/ Operating Permit#	Nature of Documented Conduct	Type of Department Action	Status Litigation; Existing/Continuing; or corrected/Date	Dollar Amount Penalty
07/21/22	Shell Polymers Monaca	PA-04-00740C	Visible Emissions >5 min in consecutive 2 hrs. MPGF, Source C204B	Notice of Violation	Pending Settlement	
08/17/22	Shell Polymers Monaca	PA-04-00740C	Cogen Q1, 2022 NOx / CO Continuous Source Monitoring System Data Submittal	Violations	Pending Finalization of Data Submittal	



08/31/22	Shell Polymers Monaca	PA-04-00740C	Visible Emissions >5 min in consecutive 2 hrs. SCTO Source C206	Notice of Violation	Pending Settlement	
09/14/22	Shell Polymers Monaca	PA-04-00740C	Intermittent Visible Emissions from TEGFs Source C205A & C205B	Notice of Violation	Pending Settlement	
9/20/22	Shell Polymers Monaca	PA-04-00740C	Intermittent Visible Emissions from TEGFs Source C205A & C205B	Notice of Violation	Pending Settlement	
10/04/22	Shell Polymers Monaca	PA-04-00740C	Cogen Q2, 2022 NOx Continuous Source Monitoring System Data Submittal	Violations	Pending Finalization of Data Submittal	
10/27/22	Shell Polymers Monaca	PA-04-00740C	Visible Emissions >5 min in consecutive 2 hrs. HP Elevated Flare Source C205C	Notice of Violation	Pending Settlement	
11/03/22	Shell Polymers Monaca	PA-04-00740C	Cogen Q3, 2022 NOx Continuous Source Monitoring System Data Submitta	Violations	Pending Finalization of Data Submittal	
12/07/22	Shell Polymers Monaca	423 Frankfort Road – Building Demolition	Failure to submit Asbestos Abatement and Demolition / Renovation Notification Form in violation of Sections 8 and 13 of APCA	Notice of Violation	Pending Settlement	
12/14/22	Shell Polymers Monaca	PA-04-00740C	12-Month Rolling Emissions Exceedances – VOC Sept – Oct 2022	Notice of Violation	Pending Settlement	
02/13/23	Shell Polymers Monaca	PA-04-00740C	12-Month Rolling Emissions Exceedances – VOC Nov – Dec and NOx Dec 2022	Notice of Violation	Pending Settlement	

**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/ Operating Permit#	Nature of Deviation	Incident Status: Existing/Continuing; or Corrected Date
Q4 2022 & Q1 2023	Shell Polymers Monaca	04-00740 A/C	Cogen NOx / CO excess emissions	Pending Continuous Source Monitoring Report - Q4 2022 Q1 2023
11/6/22 & 1/25/23	Shell Polymers Monaca	04-00740 A/C	Odor and excess emissions detected in wastewater treatment plant area	Ongoing to mitigate with source control and temporary water treatment/ emission control
10/22 and 10/31/22	Shell Polymers Monaca Site	04-00740 A/C	ECU furnace excess NOx emissions	Investigated for cause and corrected
01/16/23	Shell Polymers Monaca	04-00740 A/C	Preliminary ECU furnace stack test results not compliant for PM10 & PM2.5 on two furnaces	Review final test report and retest furnaces if necessary
2/13/23	Shell Polymers Monaca	04-00740 A/C	Visible emissions > 5 min in consecutive 2 hours and excess emissions HP Flare system	Investigated cause of ECU upset and corrected logic control settings
2/14 & 2/16/23	Shell Polymers Monaca	04-00740 A/C	HPGF NHV <500 Btu/scf	Investigation in progress

**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.

	03/14/2023
Kimberly J. Kaal	Date
Name (Print or Type)	
Environmental Manager, Attorney-in-Fact	
Title	





## Attachment A

### Plan Approval Extension Justification

Additional time is necessary to complete any outstanding construction activities and the remaining commissioning and start-up activities of all air sources and controls, including required emission testing authorized under PA-04-00740A, B and C. PA-04-00740A was first issued on June 18, 2015 and PA-04-00740B and C were issued on March 1, 2021 with all three permits expiring on April 28, 2023. High voltage equipment operation first commenced on November 12, 2019 which is a source of SF6. On-site construction activities were suspended from March 18, 2020 until May 1, 2020 to implement mitigation measures in alignment with the CDC guidance in response to the COVID-19 global pandemic. Once the mitigation measures were implemented, major construction activities resumed at the Shell Polymers Monaca Site. While most construction activities are now complete, commencement of operation and emission testing of the remaining sources and air cleaning devices are anticipated throughout the first half of 2023 per our current schedule. Temporary operation of specific air sources and controls for shakedown purposes is also expected to occur during this time period.

In accordance with PA-04-00740A, Section B, Condition #003 (d) we are 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.



## 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		Construction completed July 6, 2022	July 30, 2022, lit burners to start dry out. Ethane feed in Sept. 5, 2022.
032	Ethane Cracking Furnace #2		Construction completed July 6, 2022	May 27, 2022, lit burners to start dry out. Ethane feed in Sept. 13, 2022
033	Ethane Cracking Furnace #3		Construction completed July 6, 2022	June 1, 2022, lit burners to start dry out. Ethane feed in Sept. 6, 2022
034	Ethane Cracking Furnace #4		Construction completed July 6, 2022	August 17, 2022, lit burners to start dry out. Ethane feed in Sept. 17, 2022
035	Ethane Cracking Furnace #5		Construction completed July 6, 2022	May 12, 2022, lit burners to start dry out. Ethane feed in Sept. 5, 2022
036	Ethane Cracking Furnace #6		Construction completed July 6, 2022	May 6, 2022, lit burners to start dry out. Ethane feed in Sept. 25, 2022
037	Ethane Cracking Furnace #7		Construction completed July 6, 2022	April 14, 2022, lit burners to start dry out. Ethane feed in Sept. 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

## 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
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
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	Sept 2021
C101A		Oxidation Catalyst (Unit #1)	July 2021	Sept 2021
C102		SCR (Unit #2)	July 2021	August 2021
C102A		Oxidation Catalyst (Unit #2)	July 2021	August 2021
C103		SCR (Unit #3)	July 2021	Sept 2021
C103A		Oxidation Catalyst (Unit #3)	July 2021	Sept 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	Diesel-Fired Emergency Generator Engines (2)		March 2, 2020	March 2, 2020
106	Fire Pump Engines (2)		Dec 4, 2020	Dec 4, 2020,
107	Natural Gas-Fired Emergency Generators (3)		March 2, 2020	March 2, 2020
201	Ethylene Manufacturing Line		Construction completed July 6, 2022	September 7 2022 feed into ECU
202	Polyethylene Manufacturing Lines		Construction completed July 6, 2022	November 18, 2022 PE3 last unit to



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
				commence operation
C202		Particulate Filters (PE MFG)	Construction completed July 6, 2022	November 18, 2022 PE3 last unit to commence operation
203	Process Cooling Tower(s)		Construction completed July 6, 2022, including chemical cleaning and passivation activities	September 7 2022 feed into ECU
C203		Drift Eliminators (Process Cooling Tower)	Construction completed July 6, 2022	September 7 2022 feed into ECU
204	Low Pressure (LP) Header System		Construction completed May 16, 2022	May 16, 2022
C204		LP System	Construction completed May 16, 2022	May 16, 2022
C204A		LP Incinerator	March 31, 2022. Lit for initial dry out	March 31, 2022
C204B		LP Multipoint Ground Flare (MPGF)	March 21, 2022. Lit pilots for testing	March 21, 2022
205	High Pressure (HP) Header System		Construction completed 5/12 2022 with unloading with of propane at the HC unloading rack	May 12, 2022
C205		HP System	Construction completed 5/12 2022 with unloading with of propane at the HC unloading rack	TBD Q1 2022
C205A		HP Ground Flare	March 16, 2022. Lit pilots for testing	March 16, 2022

## 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
C205B		HP Ground Flare	March 16, 2022. Lit pilots for testing	March 16, 2022
C205C		HP Elevated Flare	March 16, 2022. 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 Construction has commenced	May 18, 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)		Construction completed July 6, 2022	TBD 2023
303	Liquid Loadout (Pyrolysis Fuel Oil, Light Gasoline)		Construction completed July 6, 2022	December 16, 2022 for PFO
304	Liquid Loadout (C3+)		Construction completed July 6, 2022	May 12, 2022
305	Liquid Loadout (Coke Residue/Tar)		Construction completed July 6, 2022	March 14, 2022 1 <sup>st</sup> load out of blended pitch from ECU
401	Storage Tanks (Recovered Oil, Equalizations Wastewater)		April 30, 2021	April 30, 2021

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
402	Storage Tank (Spent Caustic)		Construction completed July 6, 2022	August 18, 2022
403	Storage Tanks (Light Gasoline)		Construction completed July 6, 2022	February 3, 2022
404	Storage Tanks (Hexene)		Construction completed	Tank B 5/31/222 and Tank A 6/26/22
405	Storage Tanks (Misc Pressurized/ Refrigerated)		Construction completed	5/12/2022
406	Storage Tanks (Diesel Fuel > 150 gallons)		December 4, 2020	December 4, 2020
C406		Carbon Canisters (Diesel Storage Tanks)	Construction has not commenced	Note 1
407	Storage Tanks (Pyrolysis Fuel Oil)		Construction completed July 6, 2022	November 8, 2022
408	Storage Tanks (Diesel Fuel < 150 gallons)		March 2, 2020	March 2, 2020
409	Methanal Storage Vessels and Components		May 12, 2022	May 12, 2022
501	Equipment Components		Construction completed July 6, 2022	First pellets made at PE3 November 22, 2022, last PE unit to start. All areas have LDAR
502	Wastewater Treatment Plant		April 30, 2021	April 30, 2021
503	Plant Roadways		Started paving in October 2020	Complete site paving 2Q 2023
504	SF6 High Voltage Switchgear		November 12, 2019	November 12, 2019

TBD = To be Determined (Anticipated dates are subject to schedule)

Source 105, 107 engines covered by RFD 8259

Note 1: No applicable storage tank installed for requirement to apply

