



September 11, 2023

REQUEST FOR CONTROL PLAN

VIA EMAIL: Kimberly.Kaal@shell.com

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

Re: PA-04-00740C
Benzene Waste Exceedance
Shell Petrochemical Complex
Potter Township
Beaver County

Dear Kimberly Kaal:

An August 28, 2023 review of the report submitted by Shell Chemical Appalachia LLC (“Shell”) Petrochemicals Complex on April 19, 2023 identified violations of PA-04-00740C and 25 Pa. Code § 127.25. Specifically, Shell stated that the Shell Petrochemicals Complex in Beaver County will generate 59.22 Mg/yr of benzene in its waste and wastewater.

PA-04-00740C, Section C, Condition #008, states “total benzene quantity from facility waste shall not equal or exceed 11 tons per year as determined through 40 CFR §61.355. [This limit is for the purpose of compliance with limited requirements of 40 CFR Part 61 Subpart FF for a facility with benzene waste less than 10 Mg (11 tons) per year].” By permitting benzene waste generation equal to or in excess of 11 tons per year, Shell caused a violation of PA-04-00740C and 25 Pa. Code § 127.25.

The Department requests that within **fifteen (15) days** of receipt of this letter, Shell Chemical Appalachia LLC (“Shell”) Petrochemicals Complex submit a control plan address the benzene waste generation exceedance to Elizabeth Speicher at Department of Environmental Protection, Air Quality Program, 400 Waterfront Drive | Pittsburgh, PA 15222-4745. The control plan should include a detailed description of any planned corrective action(s) to address the violation(s) and should identify a schedule, with applicable milestones indicated, for implementation and completion of these corrective action(s). This Request for Control Plan is neither an order nor any other final action of the Department of Environmental Protection. It neither imposes nor waives any enforcement action available to the Department under any of its statutes. If the Department determines that an enforcement action is appropriate, you will be notified of the action.

If you have any questions regarding this Request for Control Plan, you may contact me at sbeudway@pa.gov or at 412-417-7952.

Sincerely,

Sincerely,

Scott Beudway/SB

Scott Beudway
Air Quality Specialist
Air Quality

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