27	00-FM-AQ0023 Rev. 1/2008 pennsylvania DEPARTMENT OF ENVIRONMENTAL PROTECTION		INSPECTION REPORT				Commonwealth of Pennsylvania Department of Environmental Protection Air Quality Program				
	te(s) of Inspection: TV]	Permit #(s): PA-04-00740A, B, C		n Date:	Case 04 -		PF ID #: 775836			
	mpany Name: nell Chemical Appalachia LLC		Municipality: Potter Township				County: Beaver				
SH	nt Name: IELL CHEM APPALACHIA ETROCHEMICALS COMPLEX		Physical Location: Route 18			Federal ID — Plant Code #: 46-1624986-1					
W	sponsible Official: illiam Watson			Mailing Address: 300 Frankfort Road							
	eneral Manager		Monaca, PA 1506				61-2210				
	one #(s): 24-709-2825										
M	ark (X) All Inspection Types Th	nat	Apply To This In	spectio	n:						
	Full Compliance Evaluation (FCE)		Plan Approval Inspection	on			File Review (FR)				
	Operating Permit Inspection (PI)		Initial Permit Inspection	n (IPI)		\boxtimes	Complaint Inspectio	n (CI)			
\boxtimes	Routine/Partial (RTPT)		Follow-Up Inspection (Ref. Date:)		Sample Collection (SC)				
	Minor Source(s) Inspection (RFD)		Stack Test Observation	n			Multi-Media Inspection (MM)				
	Other:		Announced								
An	nual Compliance Certification Received:	ΥE	S □ NO ⊠ N/A		Date Received	d:					
ΑI	MS Report Received:	ΥE	S NO N/A		Date Received	d:					
M	ark (X) All Activities That Appl	y:									
	File Review		Pre-Inspection Briefing				Exit Interview/Briefing				
	Pre-Inspection Observations		Check For New/Unreported Sources				Sample(s) Collected				
	Visible Emissions Observations		Verify Operation of CEMS				Other				
SI I d by	mpliance Status: ⊠ In □ Ou C: 2821 NAICS observed the Shell Chemicals fac of the Dock 6 building. I did not o eam from the Elevated Flare and	S: 2	21112 y tonight from 7:30 rve any visible, fuç	PM to	9:30 PM. T	was nissi	ions today. I ob	the Ohio River			
	mpany Representative: EMO TO FILE	Title	e: 	Signature:			Date:				
	P Representative:	Title	e: · Quality Specialist					Date/Time: 12/4/23			
ins	s document is official notification that a represental bection are shown above and on any attached page ults or from any additional review of Department re	es, ar	nd may include violations und	covered duri	ng the inspection.	Violati					

Page 1 of 3 eFacts Inspection ID#: 3654440 Date: 12/5/23 Reviewed By

Shell Chemical Appalachia LLC, 04-00740

I contacted Shell Chemicals to inform them of my observations and to request the list of operating sources and control devices. Shell Chemicals provided a list of sources and control devices in operation at the time of my observations. Shell Chemicals also submitted records (attached) of an analysis of the gas composition for the material being routed to the flare.

Sources reported to be in operation during my site observation:

Note that the plant (all of ECU and all of PE) was down during the inspection windows.

12/4/2023 7:30 PM to 9:30 PM Source and Controls Status

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031 Ethane Cracking Furnace 1 – Operating (Hot Steam Standby)
032 Ethane Cracking Furnace 2 –Not Operating (Pilot)
033 Ethane Cracking Furnace 3 – Operating (Hot Steam Standby)
034 Ethane Cracking Furnace 4 –Not Operating (Pilot)
035 Ethane Cracking Furnace 5 - Operating (Hot Steam Standby)
036 Ethane Cracking Furnace 6 –Not Operating (Pilot)
037 Ethane Cracking Furnace 7 –Not Operating (No Pilots)
101 Cogen 1 CT + DB - Operating
102 Cogen 2 CT+ DB - Operating
103 Cogen 3 CT+ DB - Operating
104 Cogeneration Plant Cooling Tower - Operating
105 Diesel-Fired Emergency Generator Engines - Standby
106 Fire Pump Engines - Standby
107 Natural Gas Fired Emergency Generator Engines - Standby
201 Ethylene Manufacturing Line - Not Operating
202 Polyethylene Manufacturing Lines – PE1 Not Operating, PE2 Not Operating, PE3 Not Operating
203 Process Cooling Tower - Operating
204 Low Pressure (LP) Header System - Operating Multipoint Ground Flare and LP Incinerator
205 High Pressure (HP) Header System - Operating HP Ground Flare A and B, HP Elevated Flare on Standby
206 Spent Caustic Vent Header System – Operating Spent Caustic Vent Incinerator
301 Polyethylene Pellet Material Storage/Handling/Loadout – Not Operating
302 Liquid Loadout (Recovered Oil) - Not Operating
303 Liquid Loadout (Pyrolysis Fuel Oil, Light Gasoline) - Not Operating
304 Liquid Loadout (C3+, Butene, Isopentane, Isobutane, C3+ Ref) -Not operating
305 Liquid Loadout (Coke Residue/Tar) – Not operating
401 Storage Tanks (Recovered Oil, Equalization Wastewater) - Operating
402 Storage Tank (Spent Caustic) - Operating
403 Storage Tanks (Light Gasoline) - Operating
404 Storage Tanks (Hexene) - Operating
405 Storage Tanks (Misc Pressurized/Refrigerated) - Operating
406 Storage Tanks (Diesel Fuel > 150 Gallons) - Operating
407 Storage Tanks (Pyrolysis Fuel Oil) - Operating
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501 Equipment Components - Operating 502 Wastewater Treatment Plant - Operating

408 Storage Tanks (Diesel Fuel < 150 Gallons) - Operating

409 Methanol Storage Vessels and Associated Components -Operating

503 Plant Roadways - In Use

All Listed Controls Operating

Shell Chemical Appalachia LLC, 04-00740

PADEP Policy Information

DEP is now accepting permit and authorization applications, as well as other documents and correspondence, electronically through the OnBase Electronic Forms Upload tool. Please use the link below to view the webpage, get instructions, and submit documents:

Effective January 16, 2021, all air quality applications, Permits, Requests for Determinations and initial Asbestos Notifications will be subject to new and/or increased fees. The new fees and other PADEP Air Quality information can be found at: https://www.dep.pa.gov/Business/Air/Pages/default.aspx

As of July 29, 2021, the Source Testing Section has gone paperless. An individual Source Testing Section reviewer may request a hard copy from the facility or the consultant. Note that the section will continue to require electronic submissions of protocols and reports to the resource email account (<u>raepstacktesting@pa.gov</u> or by disk and snail mail when the file is over 35 MBs). Periodic Monitoring reports (generally three 20-minute test runs) shall only be submitted to the regional office.

As of November 10, 2021, there have been some changes to how the regional offices will accept electronic submission. OnBase submissions of protocols and reports will no longer be accepted for Source Testing.

SWRO: Any email submission to <u>ra-epstacktesting@pa.gov</u> should also be CC-ed to <u>ra-epswstacktesting@pa.gov</u>. Beyond that email cc, no further submission is necessary to DEP SWRO (i.e. no hard copy or disk needed for SWRO).

Shell Polymers HP Flare System GC Hourly Average Compositions*

	Elemental											
	Hydrogen	Nitrogen	Methane	Ethane	Acetylene	Ethylene	C3	C4	C4 Olefins	C5	C6+	Total
Date and Time	% mol	% mol	% mol	% mol	% mol	% mol	% mol	% mol	% mol	% mol	% mol	% mol
04-Dec-23 19:00:00	8.01	47.54	22.83	7.58	0.09	12.66	0.99	0.03	0.24	0.00	0.02	100.00
04-Dec-23 20:00:00	7.25	46.23	27.94	6.71	0.07	10.76	0.74	0.03	0.25	0.00	0.02	100.00
04-Dec-23 21:00:00	3.65	25.86	59.09	5.50	0.03	5.31	0.37	0.03	0.13	0.00	0.01	100.00

Shell Polymers LP System Thermal Oxidizer GC Hourly Average Compositions*

	Elemental											
	Hydrogen	Nitrogen	Methane	Ethane	Acetylene	Ethylene	C3	C4	C4 Olefins	C5	C6+	Total
Date and Time	% mol	% mol	% mol	% mol	% mol	% mol	% mol	% mol	% mol	% mol	% mol	% mol
04-Dec-23 19:00:00	0.03	10.61	84.64	4.58	0.00	0.00	0.12	0.02	0.00	0.00	0.00	100.00
04-Dec-23 20:00:00	0.03	10.50	84.98	4.34	0.00	0.00	0.12	0.02	0.00	0.00	0.00	100.00
04-Dec-23 21:00:00	0.03	10.37	84.78	4.67	0.00	0.00	0.12	0.02	0.00	0.00	0.00	100.00
			·									

Shell Polymers LP System Multipoint Ground Flare PE1/2 Episodic Vent Header*

			•	•	•							
	Elemental											
	Hydrogen	Nitrogen	Methane	Ethane	Acetylene	Ethylene	C3	C4	C4 Olefins	C5	C6+	Total
Date and Time	% mol	% mol	% mol	% mol	% mol	% mol	% mol	% mol	% mol	% mol	% mol	% mol
04-Dec-23 19:00:00	0.03	22.50	73.45	3.90	0.00	0.00	0.11	0.02	0.00	0.00	0.00	100.00
04-Dec-23 20:00:00	0.03	22.59	73.56	3.69	0.00	0.00	0.11	0.02	0.00	0.00	0.00	100.00
04-Dec-23 21:00:00	0.03	22.76	73.15	3.94	0.00	0.00	0.11	0.02	0.00	0.00	0.00	100.00

^{*} All data still subject to final QC for purposes of emissions inventory calculations and submittals