27	700-FM-AQ0023 Rev			INSPECTION REPORT				Commonwealth of Pennsylvania Department of Environmental Protection Air Quality Program			
	ate(s) of Inspection:	TV PA SM GP MEGA]	Permit #(s): PA-04-00740A, B, C	Expiration Date:		Case 04 -	#: 00740	PF ID #: 775836		
	ompany Name: hell Chemical <i>A</i>	Appalachia LLC		Municipality: Potter Township				County: Beaver			
SI	ant Name: HELL CHEM APPA ETROCHEMICALS			Physical Location: Route 18				eral ID — Plant Code : 1624986-1	# :		
	esponsible Official: /illiam Watson				Mailing A	ddress: rankfort Ro	ad				
	eneral Manage	r			Mona	ca, PA 1506	31-2 2	210			
	ione #(s): 24-709-2825										
M	lark (X) All Insp	ection Types Th	at	Apply To This In	spectio	n:					
	Full Compliance Eva	aluation (FCE)		Plan Approval Inspection	on			File Review (FR)			
	Operating Permit Ins	spection (PI)		Initial Permit Inspection	n (IPI)		\boxtimes	Complaint Inspect	ion (CI)		
\boxtimes	Routine/Partial (RTF	PT)		Follow-Up Inspection (Ref. Date:)		Sample Collection (SC)			
	Minor Source(s) Insp	pection (RFD)		Stack Test Observation	า			Multi-Media Inspection (MM)			
	Other:			Announced							
Ar	nnual Compliance Cert	tification Received:	YES	S □ NO ⊠ N/A		Date Received	l:				
ΑI	MS Report Received:		YES	S NO N/A		Date Received	l:				
M	lark (X) All Acti	vities That Appl	y:								
	File Review			Pre-Inspection Briefing			Exit Interview/Briefing				
	Pre-Inspection Obse	ervations		Check For New/Unreported Sources				Sample(s) Collected			
	Visible Emissions O			Verify Operation of CE	MS			Other			
S		NAICS	ship		-	·		s a Follow-Up Insp			
l d by	observed the Sh y the Dock 6 bui	ell Chemicals fac Iding. I did not o	ility ose	v today from 11:05 rve any visible, fuo poling Towers. Th	gitive o	malodor en	niss	ions today. I d	bserved only		
li	inspected Indust	ry, Vanport and I	Зеа	ver mid-day today	and di	d not observ	e aı	ny malodors.			
	ompany Representativ IEMO TO FILE	e:	Title): 	Signature:			Date:			
DI	EP Representative:		Title):		Signature:			Date/Time:		
S	cott Beaudway		Air	Quality Specialist	:	Scott Beau	dwa	y/SB	12/5/23		
Th	is document is official not	tification that a representat	ive of	the Department of Environr	mental Prote	ection, Air Quality F	Progra	m, inspected the ident	ified site. The findings of this		

inspection are shown above and on any attached pages, and may include violations uncovered during the inspection. Violations may also be discovered upon review of sample results or from any additional review of Department records. Notification will be forthcoming, if such violations are noted.

Page 1 of 3 eFacts Inspection ID#: 3654442 Date: 12/5/23 Reviewed By Kristin Folland

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.

12/5/2023 11:05 AM to 12:30 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 Polvethylene 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:

https://www.dep.pa.gov/DataandTools/Pages/Application-Form-Upload.aspx

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+	Tota
Date and Time	% mol	% mol	% mol	% mol	% mol	% mol	% mol	% mol	% mol	% mol	% mol	% mol
05-Dec-23 11:00:00	0.84	25.66	64.65	6.66	0.02	1.85	0.23	0.03	0.04	0.00	0.03	100.00
05-Dec-23 12:00:00	0.85	24.81	65.06	6.84	0.02	2.07	0.24	0.03	0.04	0.00	0.04	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
05-Dec-23 11:00:00	0.02	43.32	51.50	4.96	0.00	0.00	0.14	0.03	0.00	0.01	0.02	100.00
05-Dec-23 12:00:00	0.02	43.98	50.83	4.98	0.00	0.00	0.14	0.03	0.00	0.01	0.01	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
05-Dec-23 11:00:00	0.03	15.44	76.93	7.34	0.00	0.00	0.21	0.03	0.00	0.00	0.00	100.00
05-Dec-23 12:00:00	0.03	15.43	76.82	7.46	0.00	0.00	0.22	0.04	0.00	0.00	0.00	100.00

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