



April 11, 2016

Shell Chemical Appalachia LLC

Mr. Alan Binder  
Air Quality Engineering Specialist  
Department of Environmental Protection  
Southwest Regional Office  
400 Waterfront Drive  
Pittsburgh, PA 15222

Shell Oil Company  
One Shell Plaza  
910 Louisiana St.  
Houston, TX 77002  
United States of America  
Internet: www.shell.us

**Subject: Shell Chemical Appalachia LLC  
Petrochemicals Complex  
Plan Approval No. 04-00740A  
Modification Application to Incorporate Emissions  
Reductions Credits to Existing Plan Approval**

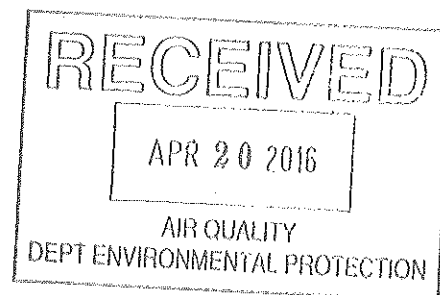
Dear Mr. Binder:

Shell Chemical Appalachia LLC is pleased to submit this modification application to Pennsylvania Department of Environmental Protection (PADEP) in reference to Plan Approval No. 04-00740A to incorporate the Emission Reduction Credits (ERCs) specified in Plan Approval conditions #037 and #038.

This major modification application contains the following information.

- Completed General Information Form
- Completed Compliance Review Form
- Completed first page of the processes plan approval application form for the Responsible Official Signature
- Municipal Notifications and Receipts
- Proof that the ERCs are registered and owned by Shell
- A check made out to PADEP in the amount \$3,400 for the total processing fee (reflects the fact that sources at the Shell facility are subject to 40 CFR Part 60 and Part 61)

Section #037 of the Plan Approval [25 Pa. Code §127.206] states that the Owner/Operator (Shell Chemical) shall secure 400 tons of NOx, 620 tons of VOC, and 159 tons of PM2.5 ERCs. A summary of ERCs secured is presented below:



Shell Chemical Appalachia LLC is a trading style used  
by a network of companies  
of the Shell Group

### ERC Summary Table

Description	PM2.5 Tons	VOC Tons	NO <sub>x</sub> Tons
<b>ERCs Required by Plan Approval</b>	<b>159</b>	<b>620</b>	<b>400</b>
ERCs Secured from GF Wheaton PP with an expiry date of 9/11/21	24.05	9	899.6
ERCs Secured from Monaca Zinc Smelter with an expiry date of 4/26/24	34.10	64	211
ERCs Secured from First Energy Armstrong Plant Unit 1 with an expiry date of 8/31/22	49	10.18	--
ERCs Secured from First Energy Mitchell Plant Unit 3 with an expiry date of 10/4/23	91	13	--
ERCs Secured from First Energy Armstrong Plant Unit 2 with an expiry date of 7/21/22	--	10.82	--
<b>Total ERC Secured</b>	<b>198.15</b>	<b>107.00</b>	<b>1110.6</b>
<b>ERC Applied to Plan Approval</b>	<b>159</b>	<b>107</b>	<b>400</b>

#### Municipal Notifications

Municipal Notifications have been sent to the following parties.

Ms. Rebecca Matsco  
 Chairwoman, Potter Township Board of Supervisors  
 300 Mowry Road  
 Monaco, PA 15061

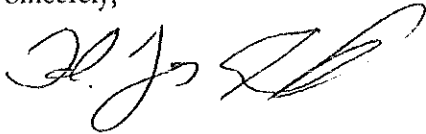
Mr. Tony Amadio  
 Chairman, Beaver County Commissioners  
 Beaver County Courthouse  
 810 Third Street  
 Beaver, PA 15009

Mr. Bill DiCioccio, Jr.  
 Chairman, Center Township Board of Supervisors  
 224 Center Grange Road  
 Aliquippa, PA 15001

Based on the information contained in this letter and its attachments, Shell Chemical Appalachia LLC requests PADEP approval of the use of these ERCs to meet Plan Approval requirements #037 and #038.

If you have any questions, please do not hesitate to contact me at 713-241-2067 or by email at jim.sewell@shell.com.

Sincerely,

A handwritten signature in black ink, appearing to read 'H. James Sewell', written in a cursive style.

H. James Sewell  
Environmental Manager, Attorney-in-fact

Attachments

SHELL CHEMICAL APPALACHIA LLC

SPECIAL POWER OF ATTORNEY

Shell Chemical Appalachia LLC, a Delaware limited liability company (the "Company"), with offices at 910 Louisiana Street, Houston, Texas 77002, hereby appoints and authorizes Jim Sewell, who is managing environmental permitting and other regulatory affairs on behalf of the Company's efforts to construct a petrochemical facility in Beaver County, PA, as its true and lawful Attorney-in-Fact, in the name and on behalf of the Company in connection with Health, Safety, Security and Environment (HSS&E) related activities to:

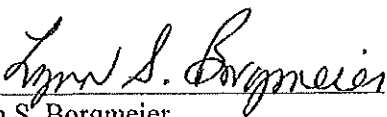
1. Interface with government agencies;
2. Make binding representations to government agencies;
3. Sign permits, licenses and applications;
4. Sign discharge monitoring reports, routine compliance reports, routine compliance reports, fines, penalties, and other required HSS&E reports; and/or
5. Sign site access agreements not to exceed \$10,000,000.00,

with full power and authority to do and perform every act and deed necessary and proper in the exercise of the forgoing powers as fully as the Company could do by any duly authorized officer, hereby ratifying and confirming all that the said Attorney-in-Fact shall lawfully do or cause to be done by virtue thereof.

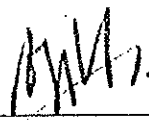
This Special Power of Attorney is effective as of June 3, 2015, and shall continue in full force and effect until specifically revoked in writing. The authorities granted by this Special Power of Attorney may not be sub-delegated.

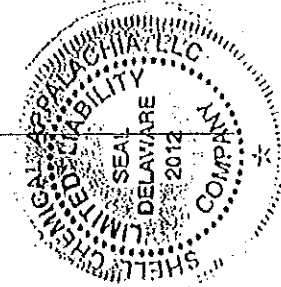
IN WITNESS WHEREOF, the Company has caused this Special Power of Attorney to be signed by its President, sealed with its company seal and attested to by its Secretary.

ATTEST:

  
Lynn S. Borgmeier  
Secretary

SHELL CHEMICAL APPALACHIA LLC

  
Ate S. Visser  
President



WITNESS:

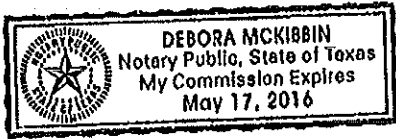
*Aylenia Reyes*

WITNESS:

*Henry Barrett*

STATE OF TEXAS       §  
                                  §  
COUNTY OF HARRIS   §

This instrument was acknowledged before me on the 10<sup>th</sup> day of June, 2015 by Ate S. Visser, President of Shell Chemical Appalachia LLC, a Delaware limited liability company, on behalf of said company.



*Debora McKibbin*  
Notary Public in and for the State of Texas

# **Shell Chemical Appalachia LLC / Petrochemicals Complex**

**Application for Authorization to Modify Plan Approval  
Permit (04-00740A)**

Prepared for:  
Shell Chemical  
Appalachia LLC  
300 Frankfort Road  
Monaca, PA 15061

Prepared by:



**April 2016**

## **Table of Contents**

- 1.0 General Information Form**
- 2.0 Compliance Review Form**
- 3.0 Processes Application Form**
- 4.0 Municipal Notifications**
- 5.0 Approval Letters (PADEP) ERC Registry and Ownership**
- 6.0 Plan Approval Application Fee**

1.0

## General Information Form





**GENERAL INFORMATION FORM – AUTHORIZATION APPLICATION**

Before completing this General Information Form (GIF), read the step-by-step instructions provided in this application package. This version of the General Information Form (GIF) must be completed and returned with any program-specific application being submitted to the Department.

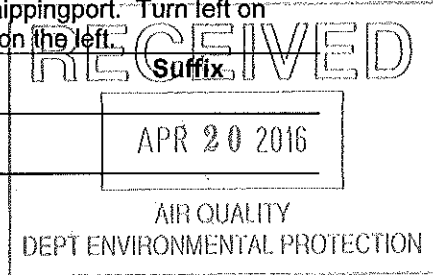
Related ID#s (If Known) Client ID# _____ APS ID# _____ Site ID# _____ Auth ID# _____ Facility ID# _____		<b>DEP USE ONLY</b> Date Received & General Notes
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**CLIENT INFORMATION**

DEP Client ID#	Client Type / Code			
	LLC			
Organization Name or Registered Fictitious Name		Employer ID# (EIN)	Dun & Bradstreet ID#	
Shell Chemical Appalachia LLC				
Individual Last Name	First Name	MI	Suffix	SSN
Sewell	H	James		
Additional Individual Last Name	First Name	MI	Suffix	SSN
Mailing Address Line 1		Mailing Address Line 2		
300 Frankfort Road				
Address Last Line – City		State	ZIP+4	Country
Monaca		PA	15061	USA
Client Contact Last Name	First Name	MI	Suffix	
Sewell	H	James		
Client Contact Title	Phone		Ext	
Franklin Environmental Manager	(713) 241-2067			
Email Address	FAX			
jim.sewell@shell.com				

**SITE INFORMATION**

DEP Site ID#	Site Name			
	Shell Chemical Appalachia LLC			
EPA ID#	Estimated Number of Employees to be Present at Site			400
Description of Site				
Petrochemical complex manufacturing ethylene and polyethylene				
County Name	Municipality	City	Boro	Twp
Beaver	Potter	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
County Name	Municipality	City	Boro	Twp
Beaver	Center	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Site Location Line 1		Site Location Line 2		
300 Frankfort Road				
Site Location Last Line – City		State	ZIP+4	
Monaca		PA	15061	
Detailed Written Directions to Site				
Approximately 30 miles from Pittsburgh, PA on I-376 W. Exit 39 (PA 18) toward Monaca/Shippingport. Turn left on PA 18S, Frankfort Road. Turn Right on Old Route 18. Turn Left on Frankfort Road. Site is on the left.				
Site Contact Last Name	First Name	MI	Suffix	
Sewell	H	James		
Site Contact Title	Site Contact Firm			
Franklin Environmental Manager	Shell Chemical Appalachia LLC			
Mailing Address Line 1		Mailing Address Line 2		
300 Frankfort Road				



<b>Mailing Address Last Line – City</b> Monaca			<b>State</b> PA	<b>ZIP+4</b> 15061
<b>Phone</b> (713) 241-2067	<b>Ext</b>	<b>FAX</b>	<b>Email Address</b> jim.sewell@shell.com	
<b>NAICS Codes (Two- &amp; Three-Digit Codes – List All That Apply)</b> 32, 22			<b>6-Digit Code (Optional)</b> 325110, 325211, 221112	
<b>Client to Site Relationship</b> Owner/Operator				

**FACILITY INFORMATION**

<b>Modification of Existing Facility</b>	<b>Yes</b>	<b>No</b>
1. Will this project modify an existing facility, system, or activity?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
2. Will this project involve an addition to an existing facility, system, or activity?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<i>If "Yes", check all relevant facility types and provide DEP facility identification numbers below.</i>		

Facility Type	DEP Fac ID#	Facility Type	DEP Fac ID#
<input type="checkbox"/> Air Emission Plant	_____	<input type="checkbox"/> Industrial Minerals Mining Operation	_____
<input type="checkbox"/> Beneficial Use (water)	_____	<input type="checkbox"/> Laboratory Location	_____
<input type="checkbox"/> Blasting Operation	_____	<input type="checkbox"/> Land Recycling Cleanup Location	_____
<input type="checkbox"/> Captive Hazardous Waste Operation	_____	<input type="checkbox"/> MineDrainageTrmt/LandRecyProjLocation	_____
<input type="checkbox"/> Coal Ash Beneficial Use Operation	_____	<input type="checkbox"/> Municipal Waste Operation	_____
<input type="checkbox"/> Coal Mining Operation	_____	<input type="checkbox"/> Oil & Gas Encroachment Location	_____
<input type="checkbox"/> Coal Pillar Location	_____	<input type="checkbox"/> Oil & Gas Location	_____
<input type="checkbox"/> Commercial Hazardous Waste Operation	_____	<input type="checkbox"/> Oil & Gas Water Poll Control Facility	_____
<input type="checkbox"/> Dam Location	_____	<input type="checkbox"/> Public Water Supply System	_____
<input type="checkbox"/> Deep Mine Safety Operation -Anthracite	_____	<input type="checkbox"/> Radiation Facility	_____
<input type="checkbox"/> Deep Mine Safety Operation -Bituminous	_____	<input type="checkbox"/> Residual Waste Operation	_____
<input type="checkbox"/> Deep Mine Safety Operation -Ind Minerals	_____	<input type="checkbox"/> Storage Tank Location	_____
<input type="checkbox"/> Encroachment Location (water, wetland)	_____	<input type="checkbox"/> Water Pollution Control Facility	_____
<input type="checkbox"/> Erosion & Sediment Control Facility	_____	<input type="checkbox"/> Water Resource	_____
<input type="checkbox"/> Explosive Storage Location	_____	<input type="checkbox"/> Other:	_____

<b>Latitude/Longitude Point of Origin</b>	<b>Latitude</b>			<b>Longitude</b>		
	<b>Degrees</b>	<b>Minutes</b>	<b>Seconds</b>	<b>Degrees</b>	<b>Minutes</b>	<b>Seconds</b>
CNTAR	40	40	17.724	80	20	10.724
<b>Horizontal Accuracy Measure</b>	Feet	18	--or--	Meters		
<b>Horizontal Reference Datum Code</b>	<input type="checkbox"/> North American Datum of 1927 <input checked="" type="checkbox"/> North American Datum of 1983 <input type="checkbox"/> World Geodetic System of 1984					
<b>Horizontal Collection Method Code</b>	GISDR					
<b>Reference Point Code</b>	CNTAR					
<b>Altitude</b>	Feet	785.91	--or--	Meters		
<b>Altitude Datum Name</b>	<input type="checkbox"/> The National Geodetic Vertical Datum of 1929 <input checked="" type="checkbox"/> The North American Vertical Datum of 1988 (NAVD88)					
<b>Altitude (Vertical) Location Datum Collection Method Code</b>	SRVEY					
<b>Geometric Type Code</b>	POINT					
<b>Data Collection Date</b>	5/26/2012					
<b>Source Map Scale Number</b>	1	Inch(es)	=	200	Feet	
	--or--	Centimeter(s)	=		Meters	

**PROJECT INFORMATION**

**Project Name**  
Shell Chemical Appalachia LLC Petrochemical Complex

**Project Description**  
Construction and operation of an ethane cracker and three polyethylene units. All the ethylene produced by thermally cracking ethane will be used to produce polyethylene. Additional facilities include utilities (natural gas-fired cogeneration plant, water treatment, cooling water), waste treatment systems (wastewater, flare, solid waste handling), storage and logistics (tanks, silos, rail yard, track racks, and dock facilities), buildings (administration building, control room, maintenance facilities, catalyst storage), and site infrastructure. The cogeneration plant will provide steam and electricity to the site and send electricity to the grid.

<b>Project Consultant Last Name</b> Samarco		<b>First Name</b> Thomas		<b>MI</b> J	<b>Suffix</b>
<b>Project Consultant Title</b>			Consulting Firm Arcadis		
<b>Mailing Address Line 1</b> 6041 Wallace Road Extension, Suite 300			<b>Mailing Address Line 2</b>		
<b>Address Last Line – City</b> Wexford			<b>State</b> PA	<b>ZIP+4</b> 15090	
<b>Phone</b> (724) 934-9549	<b>Ext</b>	<b>FAX</b> (724) 742-9189	<b>Email Address</b> Tom.samarco@arcadis.com		
<b>Time Schedules</b>	<b>Project Milestone (Optional)</b> N/A				

1. Have you informed the surrounding community and addressed any concerns prior to submitting the application to the Department?  Yes  No
2. Is your project funded by state or federal grants?  Yes  No  
 Note: If "Yes", specify what aspect of the project is related to the grant and provide the grant source, contact person and grant expiration date.  
 Aspect of Project Related to Grant \_\_\_\_\_  
 Grant Source: \_\_\_\_\_  
 Grant Contact Person: \_\_\_\_\_  
 Grant Expiration Date: \_\_\_\_\_
3. Is this application for an authorization on Appendix A of the Land Use Policy? (For referenced list, see Appendix A of the Land Use Policy attached to GIF instructions)  Yes  No  
 Note: If "No" to Question 3, the application is not subject to the Land Use Policy.  
 If "Yes" to Question 3, the application is subject to this policy and the Applicant should answer the additional questions in the Land Use Information section.

**LAND USE INFORMATION**

- Note:** Applicants are encouraged to submit copies of local land use approvals or other evidence of compliance with local comprehensive plans and zoning ordinances.
1. Is there an adopted county or multi-county comprehensive plan?  Yes  No
  2. Is there an adopted municipal or multi-municipal comprehensive plan?  Yes  No
  3. Is there an adopted county-wide zoning ordinance, municipal zoning ordinance or joint municipal zoning ordinance?  Yes  No  
 Note: If the Applicant answers "No" to either Questions 1, 2 or 3, the provisions of the PA MPC are not applicable and the Applicant does not need to respond to questions 4 and 5 below.  
 If the Applicant answers "Yes" to questions 1, 2 and 3, the Applicant should respond to questions 4 and 5 below.
  4. Does the proposed project meet the provisions of the zoning ordinance or does the proposed project have zoning approval? If zoning approval has been received, attach documentation.  Yes  No
  5. Have you attached Municipal and County Land Use Letters for the project?  Yes  No

<b>COORDINATION INFORMATION</b>
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**Note:** The PA Historical and Museum Commission must be notified of proposed projects in accordance with DEP Technical Guidance Document 012-0700-001 and the accompanying Cultural Resource Notice Form.

If the activity will be a mining project (i.e., mining of coal or industrial minerals, coal refuse disposal and/or the operation of a coal or industrial minerals preparation/processing facility), respond to questions 1.0 through 2.5 below.

If the activity will not be a mining project, skip questions 1.0 through 2.5 and begin with question 3.0.

1.0	Is this a coal mining project? If "Yes", respond to 1.1-1.6. If "No", skip to Question 2.0.	<input type="checkbox"/>	Yes	<input checked="" type="checkbox"/>	No
1.1	Will this coal mining project involve coal preparation/ processing activities in which the total amount of coal prepared/processed will be equal to or greater than 200 tons/day?	<input type="checkbox"/>	Yes	<input type="checkbox"/>	No
1.2	Will this coal mining project involve coal preparation/ processing activities in which the total amount of coal prepared/processed will be greater than 50,000 tons/year?	<input type="checkbox"/>	Yes	<input type="checkbox"/>	No
1.3	Will this coal mining project involve coal preparation/ processing activities in which thermal coal dryers or pneumatic coal cleaners will be used?	<input type="checkbox"/>	Yes	<input type="checkbox"/>	No
1.4	For this coal mining project, will sewage treatment facilities be constructed and treated waste water discharged to surface waters?	<input type="checkbox"/>	Yes	<input type="checkbox"/>	No
1.5	Will this coal mining project involve the construction of a permanent impoundment meeting one or more of the following criteria: (1) a contributory drainage area exceeding 100 acres; (2) a depth of water measured by the upstream toe of the dam at maximum storage elevation exceeding 15 feet; (3) an impounding capacity at maximum storage elevation exceeding 50 acre-feet?	<input type="checkbox"/>	Yes	<input type="checkbox"/>	No
1.6	Will this coal mining project involve underground coal mining to be conducted within 500 feet of an oil or gas well?	<input type="checkbox"/>	Yes	<input type="checkbox"/>	No
2.0	Is this a non-coal (industrial minerals) mining project? If "Yes", respond to 2.1-2.6. If "No", skip to Question 3.0.	<input type="checkbox"/>	Yes	<input checked="" type="checkbox"/>	No
2.1	Will this non-coal (industrial minerals) mining project involve the crushing and screening of non-coal minerals other than sand and gravel?	<input type="checkbox"/>	Yes	<input type="checkbox"/>	No
2.2	Will this non-coal (industrial minerals) mining project involve the crushing and/or screening of sand and gravel with the exception of wet sand and gravel operations (screening only) and dry sand and gravel operations with a capacity of less than 150 tons/hour of unconsolidated materials?	<input type="checkbox"/>	Yes	<input type="checkbox"/>	No
2.3	Will this non-coal (industrial minerals) mining project involve the construction, operation and/or modification of a portable non-metallic (i.e., non-coal) minerals processing plant under the authority of the General Permit for Portable Non-metallic Mineral Processing Plants (i.e., BAQ-PGPA/GP-3)?	<input type="checkbox"/>	Yes	<input type="checkbox"/>	No
2.4	For this non-coal (industrial minerals) mining project, will sewage treatment facilities be constructed and treated waste water discharged to surface waters?	<input type="checkbox"/>	Yes	<input type="checkbox"/>	No
2.5	Will this non-coal (industrial minerals) mining project involve the construction of a permanent impoundment meeting one or more of the following criteria: (1) a contributory drainage area exceeding 100 acres; (2) a depth of water measured by the upstream toe of the dam at maximum storage elevation exceeding 15 feet; (3) an impounding capacity at maximum storage elevation exceeding 50 acre-feet?	<input type="checkbox"/>	Yes	<input type="checkbox"/>	No

3.0	Will your project, activity, or authorization have anything to do with a well related to oil or gas production, have construction within 200 feet of, affect an oil or gas well, involve the waste from such a well, or string power lines above an oil or gas well? If "Yes", respond to 3.1-3.3. If "No", skip to Question 4.0.	<input type="checkbox"/>	Yes	<input checked="" type="checkbox"/>	No
3.1	Does the oil- or gas-related project involve any of the following: placement of fill, excavation within or placement of a structure, located in, along, across or projecting into a watercourse, floodway or body of water (including wetlands)?	<input type="checkbox"/>	Yes	<input type="checkbox"/>	No
3.2	Will the oil- or gas-related project involve discharge of industrial wastewater or stormwater to a dry swale, surface water, ground water or an existing sanitary sewer system or storm water system? If "Yes", discuss in <i>Project Description</i> .	<input type="checkbox"/>	Yes	<input type="checkbox"/>	No
3.3	Will the oil- or gas-related project involve the construction and operation of industrial waste treatment facilities?	<input type="checkbox"/>	Yes	<input type="checkbox"/>	No
4.0	Will the project involve a construction activity that results in earth disturbance? If "Yes", specify the total disturbed acreage. 4.0.1 Total Disturbed Acreage 476 acres	<input checked="" type="checkbox"/>	Yes	<input type="checkbox"/>	No
5.0	Does the project involve any of the following? If "Yes", respond to 5.1-5.3. If "No", skip to Question 6.0.	<input checked="" type="checkbox"/>	Yes	<input type="checkbox"/>	No
5.1	Water Obstruction and Encroachment Projects – Does the project involve any of the following: placement of fill, excavation within or placement of a structure, located in, along, across or projecting into a watercourse, floodway or body of water?	<input checked="" type="checkbox"/>	Yes	<input type="checkbox"/>	No
5.2	Wetland Impacts – Does the project involve any of the following: placement of fill, excavation within or placement of a structure, located in, along, across or projecting into a wetland?	<input checked="" type="checkbox"/>	Yes	<input type="checkbox"/>	No
5.3	Floodplain Projects by the commonwealth, a Political Subdivision of the commonwealth or a Public Utility – Does the project involve any of the following: placement of fill, excavation within or placement of a structure, located in, along, across or projecting into a floodplain?	<input type="checkbox"/>	Yes	<input checked="" type="checkbox"/>	No
6.0	Will the project involve discharge of stormwater or wastewater from an industrial activity to a dry swale, surface water, ground water or an existing sanitary sewer system or separate storm water system?	<input checked="" type="checkbox"/>	Yes	<input type="checkbox"/>	No
7.0	Will the project involve the construction and operation of industrial waste treatment facilities?	<input checked="" type="checkbox"/>	Yes	<input type="checkbox"/>	No
8.0	Will the project involve construction of sewage treatment facilities, sanitary sewers, or sewage pumping stations? If "Yes", indicate estimated proposed flow (gal/day). Also, discuss the sanitary sewer pipe sizes and the number of pumping stations/treatment facilities/name of downstream sewage facilities in the <i>Project Description</i> , where applicable. 8.0.1 Estimated Proposed Flow (gal/day) 315,000 gal/day – peak flow during construction. Future operation typical flow is 35,000 gal/day	<input checked="" type="checkbox"/>	Yes	<input type="checkbox"/>	No
9.0	Will the project involve the subdivision of land, or the generation of 800 gpd or more of sewage on an existing parcel of land or the generation of an additional 400 gpd of sewage on an already-developed parcel, or the generation of 800 gpd or more of industrial wastewater that would be discharged to an existing sanitary sewer system?	<input checked="" type="checkbox"/>	Yes	<input type="checkbox"/>	No
9.0.1	Was Act 537 sewage facilities planning submitted and approved by DEP? If "Yes" attach the approval letter. Approval required prior to 105/NPDES approval.	<input type="checkbox"/>	Yes	<input checked="" type="checkbox"/>	No
10.0	Is this project for the beneficial use of biosolids for land application within Pennsylvania? If "Yes" indicate how much (i.e. gallons or dry tons per year). 10.0.1 Gallons Per Year (residential septage) _____ 10.0.2 Dry Tons Per Year (biosolids) _____	<input type="checkbox"/>	Yes	<input checked="" type="checkbox"/>	No

11.0	Does the project involve construction, modification or removal of a dam? If "Yes", identify the dam.	<input type="checkbox"/>	Yes	<input checked="" type="checkbox"/>	No
11.0.1	Dam Name				
12.0	Will the project interfere with the flow from, or otherwise impact, a dam? If "Yes", identify the dam.	<input type="checkbox"/>	Yes	<input checked="" type="checkbox"/>	No
12.0.1	Dam Name				
13.0	Will the project involve operations (excluding during the construction period) that produce air emissions (i.e., NOX, VOC, etc.)? If "Yes", identify each type of emission followed by the amount of that emission.	<input checked="" type="checkbox"/>	Yes	<input type="checkbox"/>	No
13.0.1	Enter all types & amounts of emissions; separate each set with semicolons.	VOC: 522 TPY NOx: 348 TPY PM (filterable): 71 TPY PM10: 164 TPY PM2.5: 159 TPY SO2: 21 TPY CO: 1,012 TPY			
14.0	Does the project include the construction or modification of a drinking water supply to serve 15 or more connections or 25 or more people, at least 60 days out of the year? If "Yes", check all proposed sub-facilities.	<input checked="" type="checkbox"/>	Yes	<input type="checkbox"/>	No
14.0.1	Number of Persons Served	~14000 based on discussions w/Center Township Water Authority			
14.0.2	Number of Employee/Guests	>300			
14.0.3	Number of Connections	>5000			
14.0.4	Sub-Fac: Distribution System	<input checked="" type="checkbox"/>	Yes	<input type="checkbox"/>	No
14.0.5	Sub-Fac: Water Treatment Plant	<input checked="" type="checkbox"/>	Yes	<input type="checkbox"/>	No
14.0.6	Sub-Fac: Source	<input checked="" type="checkbox"/>	Yes	<input type="checkbox"/>	No
14.0.7	Sub-Fac: Pump Station	<input checked="" type="checkbox"/>	Yes	<input type="checkbox"/>	No
14.0.8	Sub Fac: Transmission Main	<input checked="" type="checkbox"/>	Yes	<input type="checkbox"/>	No
14.0.9	Sub-Fac: Storage Facility	<input checked="" type="checkbox"/>	Yes	<input type="checkbox"/>	No
15.0	Will your project include infiltration of storm water or waste water to ground water within one-half mile of a public water supply well, spring or infiltration gallery?	<input type="checkbox"/>	Yes	<input checked="" type="checkbox"/>	No
16.0	Is your project to be served by an existing public water supply? If "Yes", indicate name of supplier and attach letter from supplier stating that it will serve the project.	<input checked="" type="checkbox"/>	Yes	<input type="checkbox"/>	No
16.0.1	Supplier's Name	Center Township Water Authority			
16.0.2	Letter of Approval from Supplier is Attached	<input type="checkbox"/>	Yes	<input checked="" type="checkbox"/>	No
17.0	Will this project involve a new or increased drinking water withdrawal from a stream or other water body? If "Yes", should reference both Water Supply and Watershed Management.	<input type="checkbox"/>	Yes	<input checked="" type="checkbox"/>	No
17.0.1	Stream Name				
18.0	Will the construction or operation of this project involve treatment, storage, reuse, or disposal of waste? If "Yes", indicate what type (i.e., hazardous, municipal (including infectious & chemotherapeutic), residual) and the amount to be treated, stored, re-used or disposed.	<input checked="" type="checkbox"/>	Yes	<input type="checkbox"/>	No
18.0.1	Type & Amount	No hazardous waste will be managed. All waste materials will be appropriately packaged and shipped for disposal at an off-site location.			
19.0	Will your project involve the removal of coal, minerals, etc. as part of any earth disturbance activities?	<input type="checkbox"/>	Yes	<input checked="" type="checkbox"/>	No
20.0	Does your project involve installation of a field constructed underground storage tank? If "Yes", list each Substance & its Capacity. <b>Note:</b> Applicant may need a Storage Tank Site Specific Installation Permit.	<input type="checkbox"/>	Yes	<input checked="" type="checkbox"/>	No
20.0.1	Enter all substances & capacity of each; separate each set with semicolons.				

- 21.0 Does your project involve installation of an aboveground storage tank greater than 21,000 gallons capacity at an existing facility? If "Yes", list each Substance & its Capacity. **Note:** Applicant may need a Storage Tank Site Specific Installation Permit.  Yes  No
- 21.0.1 Enter all substances & capacity of each; separate each set with semicolons.
- 
- 22.0 Does your project involve installation of a tank greater than 1,100 gallons which will contain a highly hazardous substance as defined in DEP's Regulated Substances List, 2570-BK-DEP2724? If "Yes", list each Substance & its Capacity. **Note:** Applicant may need a Storage Tank Site Specific Installation Permit.  Yes  No
- 22.0.1 Enter all substances & capacity of each; separate each set with semicolons.
- 
- 23.0 Does your project involve installation of a storage tank at a new facility with a total AST capacity greater than 21,000 gallons? If "Yes", list each Substance & its Capacity. **Note:** Applicant may need a Storage Tank Site Specific Installation Permit.  Yes  No
- 23.0.1 Enter all substances & capacity of each; separate each set with semicolons. See Previous February 2015 Submittal
- 
- 24.0 Will the intended activity involve the use of a radiation source?  Yes  No

**CERTIFICATION**

I certify that I have the authority to submit this application on behalf of the applicant named herein and that the information provided in this application is true and correct to the best of my knowledge and information.

Type or Print Name H. James Sewell

 Attorney-in-Fact  
Signature

Franklin Environmental Manager, Shell  
Chemical Appalachia LLC  
Title

4/11/16  
Date

2.0

## Compliance Review Form





COMMONWEALTH OF PENNSYLVANIA  
 DEPARTMENT OF ENVIRONMENTAL PROTECTION  
 BUREAU OF AIR QUALITY

**AIR POLLUTION CONTROL ACT COMPLIANCE REVIEW FORM**

Fully and accurately provide the following information, as specified. Attach additional sheets as necessary.

**Type of Compliance Review Form Submittal (check all that apply)**

- |  |   |
|--|---|
| <input type="checkbox"/> Original Filing           | Date of Last Compliance Review Form Filing: |
| <input checked="" type="checkbox"/> Amended Filing | <u>February/2/2015</u>                      |

**Type of Submittal**

- |   |   |  |
|---|---|--|
| <input type="checkbox"/> New Plan Approval  | <input type="checkbox"/> New Operating Permit | <input type="checkbox"/> Renewal of Operating Permit   |
| <input type="checkbox"/> Extension of Plan Approval   | <input type="checkbox"/> Change of Ownership  | <input type="checkbox"/> Periodic Submission (@ 6 mos) |
| <input checked="" type="checkbox"/> Other: <u>Change in Management Responsibility/ERC Use Authorization</u> |   |  |

**SECTION A. GENERAL APPLICATION INFORMATION**

**Name of Applicant/Permittee/("applicant")**  
 (non-corporations-attach documentation of legal name)

Shell Chemical Appalachia LLC

**Address**      300 Frankfort Road  
                     Monaca, PA 15061

**Telephone**    713-241-2067                      **Taxpayer ID#**    46-1624986

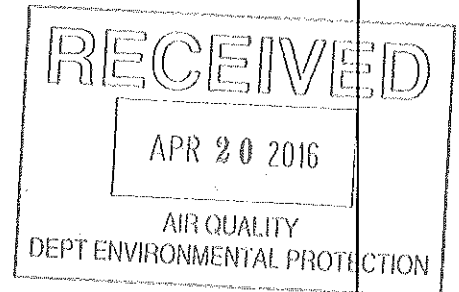
**Permit, Plan Approval or Application ID#**    04-00740A

**Identify the form of management under which the applicant conducts its business (check appropriate box)**

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

**Describe below the type(s) of business activities performed.**

Petrochemical Complex Manufacturing Ethylene and Polyethylene



**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.

Unit Name	Principal Places of Business	State of Incorporation	Taxpayer ID	Relationship to Applicant
Shell Chemical Appalachia LLC	PA	Delaware Limited Liability Company	46-1624986	Applicant

**SECTION C. SPECIFIC INFORMATION REGARDING APPLICANT AND ITS "RELATED PARTIES"**

Pennsylvania Facilities. List the name and location (mailing address, municipality, county), telephone number, and relationship to applicant (parent, subsidiary or general partner) of applicant and all Related Parties' places of business, and facilities in Pennsylvania. Attach additional sheets as necessary.

Unit Name	Street Address	County and Municipality	Telephone No.	Relationship to Applicant
Shell Chemical Appalachia LLC	300 Frankfort Road, Monaca, PA 15061	Beaver County Potter County	713-241-2067	Applicant
Harrisburg Office	500 N. Third Street, Harrisburg, PA 17101	Dauphin County City of Harrisburg	717-449-4702	Field Office of SWEPI LP, Indirect Subsidiary of 100% owner (Shell Oil Company) of above Applicant (Shell Chemical Appalachia LLC)

**Provide the names and business addresses of all general partners of the applicant and parent and subsidiary corporations, if any.**

Name	Business Address
N/A	

**List the names and business address of persons with overall management responsibility for the process being permitted (i.e. plant manager).**

Name	Business Address
H. James Sewell Environmental Manager, Shell Chemical Appalachia LLC	Shell Chemical Appalachia LLC 300 Frankfort Road Monaca, PA 15061
Ate Visser Vice President, Shell Chemical Appalachia LLC	Shell Chemical Appalachia LLC 910 Louisiana Street, OSP 100000C Houston, TX 77002

**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 5 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.**

Air Contamination Source	Plan Approval/ Operating Permit#	Location	Issuance Date	Expiration Date
Petrochemical Complex	04-00740A	Beaver County Potter Township	June 18, 2015	June 18, 2019

**Compliance Background.** (Note: Copies of specific documents, if applicable, must be made available to the Department upon its request.) 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.

Date	Location	Plan Approval/ Operating Permit#	Nature of Documented Conduct	Type of Department Action	Status: Litigation Existing/Continuing or Corrected/Date	Dollar Amount Penalty
N/A						\$
						\$
						\$
						\$
						\$
						\$
						\$
						\$
						\$
						\$
						\$

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.

Date	Location	Plan Approval/ Operating Permit#	Nature of Deviation	Incident Status: Litigation Existing/Continuing Or Corrected/Date
N/A				

**CONTINUING OBLIGATION.** Applicant is under a continuing obligation to update this form using the Compliance Review Supplemental Form if any additional deviations occur between the date of submission and Department action on the 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 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 Form.

 *Attorney-in-Fact*

*4/11/16*

Signature

Date

H. James Sewell

Name (Print or Type)

Franklin Environmental Manager, Shell Chemical Appalachia LLC

Title

3.0

## Processes Application Form



Submit in Triplicate

COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
BUREAU OF AIR QUALITY

**PROCESSES**

**Application for Plan Approval to Construct, Modify or Reactivate an Air Contamination Source and/or Install an Air Cleaning Device**

This application must be submitted with the General Information Form (GIF).

Before completing this form, read the instructions provided for the form.

**Section A - Facility Name, Checklist And Certification**

Organization Name or Registered Fictitious Name/Facility Name: Shell Chemical Appalachia LLC

DEP Client ID# (if known): \_\_\_\_\_

Type of Review required and Fees:

- Source which is not subject to NSPS, NESHAPs, MACT, NSR and PSD: ..... \$ \_\_\_\_\_
- Source requiring approval under NSPS or NESHAPS or both: ..... \$ 3,400
- Source requiring approval under NSR regulations: ..... \$ \_\_\_\_\_
- Source requiring the establishment of a MACT limitation: ..... \$ \_\_\_\_\_
- Source requiring approval under PSD: ..... \$ \_\_\_\_\_

**Applicant's Checklist**

Check the following list to make sure that all the required documents are included.

- General Information Form (GIF)
- Processes Plan Approval Application
- Compliance Review Form or provide reference of most recently submitted compliance review form for facilities submitting on a periodic basis: \_\_\_\_\_
- Copy and Proof of County and Municipal Notifications
- Permit Fees
- Addendum A: Source Applicable Requirements (only applicable to existing Title V facility)

**Certification of Truth, Accuracy and Completeness by a Responsible Official**

I, H. James Sewell, certify under penalty of law in 18 Pa. C. S. A. §4904, and 35 P.S. §4009(b) (2) that based on information and belief formed after reasonable inquiry, the statements and information in this application are true, accurate and complete.

(Signature): *H. James Sewell*, Attorney-in-Fact  
Name (Print): H. James Sewell

Date: 4/11/16  
Title: Environmental Manager

**OFFICIAL USE ONLY**

Application No. \_\_\_\_\_ Unit ID \_\_\_\_\_ Site ID \_\_\_\_\_  
DEP Client ID #: \_\_\_\_\_ APS. ID \_\_\_\_\_ AUTH. ID \_\_\_\_\_  
Date Received \_\_\_\_\_ Date Assigned \_\_\_\_\_ Reviewed By \_\_\_\_\_  
Date of 1<sup>st</sup> Technical Deficiency \_\_\_\_\_ Date of 2<sup>nd</sup> Technical Deficiency \_\_\_\_\_  
Comments: \_\_\_\_\_

4.0

## Municipal Notifications





April 11, 2016

Mr. Tony Amadio  
Chairman, Beaver Co. Commissioners  
810 Third Street  
Beaver, PA 15009

Shell Chemical Appalachia LLC

Shell Oil Company  
One Shell Plaza  
910 Louisiana St.  
Houston, TX 77002  
United States of America  
Internet: www.shell.us

Re: Shell Chemical Appalachia LLC  
Petrochemicals Complex  
Monaca, Beaver County, Pennsylvania

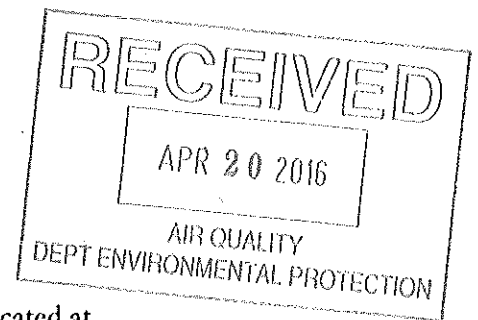
Dear Mr. Amadio:

The purpose of this notice is to inform you that Shell Chemical Appalachia LLC is submitting a modification application to Pennsylvania Department of Environmental Protection (PADEP) for Plan Approval No. 04-00740A to incorporate the Emission Reduction Credits (ERCs) specified in Plan Approval conditions #037 and #038. No other changes to the Plan Approval are being proposed at this time.

Plan Approval No.: 04-00740A  
Project: Petrochemicals Complex  
Applicant Name: Shell Chemical Appalachia LLC  
Applicant Contact: H. James Sewell  
Shell Chemical Appalachia LLC  
300 Franklin Road  
Monaca, PA 15061  
(713) 241-2067

Site Location: Former Horsehead Corporation zinc recycling facility located at  
300 Franklin Road, Monaca, Beaver County, Pennsylvania 15061

Municipality/County: Potter and Center Townships, Beaver County, PA



This letter is intended to satisfy the requirement of Pennsylvania Code 25 PA Code Section 127, Subchapter B, Plan Approval Requirements 127.43a, Municipal Notifications. Each applicant for a plan approval shall notify the local municipality and county where the air pollution source is to be located that the applicant has applied for the plan approval as required by section 1905-A of The Administrative Code 1929 (71 P.S. § 510.5).

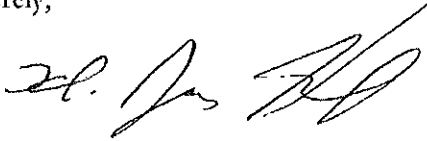
Shell Chemical Appalachia LLC is a trading style used  
by a network of companies  
of the Shell Group

The 30-day comment period begins upon receipt of the notice by the municipality and county. Any comments should be addressed to Pennsylvania Department of Environmental Protection (PADEP), Southwest Regional Office.

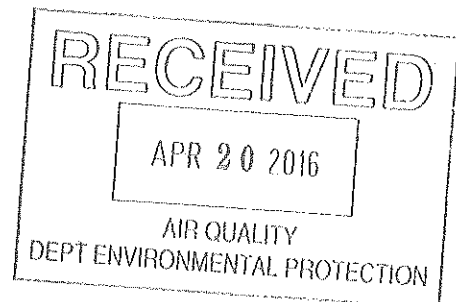
PADEP, Southwest Regional Office  
400 Waterfront Drive  
Pittsburgh, PA 15222-4745

If you have any questions, please do not hesitate to contact me at 713-241-2067 or by email at [jim.sewell@shell.com](mailto:jim.sewell@shell.com).

Sincerely,



H. James Sewell  
Environmental Manager, Attorney-in-fact





April 11, 2016

Shell Chemical Appalachia LLC

Mr. Bill DiCioccio, Jr.  
Chairman, Center Twp. Board of Supervisors  
224 Grange Road  
Aliquippa, PA 15001

Shell Oil Company  
One Shell Plaza  
910 Louisiana St.  
Houston, TX 77002  
United States of America  
Internet: www.shell.us

Re: Shell Chemical Appalachia LLC  
Petrochemicals Complex  
Monaca, Beaver County, Pennsylvania

Dear Mr. DiCioccio:

The purpose of this notice is to inform you that Shell Chemical Appalachia LLC is submitting a modification application to Pennsylvania Department of Environmental Protection (PADEP) for Plan Approval No. 04-00740A to incorporate the Emission Reduction Credits (ERCs) specified in Plan Approval conditions #037 and #038. No other changes to the Plan Approval are being proposed at this time.

Plan Approval No.: 04-00740A  
Project: Petrochemicals Complex  
Applicant Name: Shell Chemical Appalachia LLC  
Applicant Contact: James H. Sewell  
Shell Chemical Appalachia LLC  
300 Franklin Road  
Monaca, PA 15061  
(713) 241-2067

Site Location: Former Horsehead Corporation zinc recycling facility located at  
300 Franklin Road, Monaca, Beaver County, Pennsylvania 15061

Municipality/County: Potter and Center Townships, Beaver County, PA



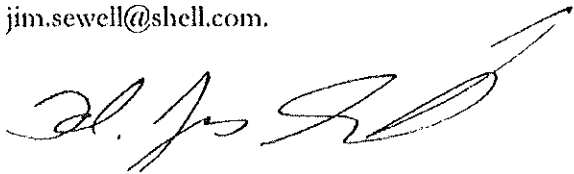
This letter is intended to satisfy the requirement of Pennsylvania Code 25 PA Code Section 127, Subchapter B, Plan Approval Requirements 127.43a, Municipal Notifications. Each applicant for a plan approval shall notify the local municipality and county where the air pollution source is to be located that the applicant has applied for the plan approval as required by section 1905-A of The Administrative Code 1929 (71 P.S. § 510.5).

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by a network of companies  
of the Shell Group

The 30-day comment period begins upon receipt of the notice by the municipality and county. Any comments should be addressed to Pennsylvania Department of Environmental Protection (PADEP), Southwest Regional Office.

PADEP, Southwest Regional Office  
400 Waterfront Drive  
Pittsburgh, PA 15222-4745

If you have any questions, please do not hesitate to contact me at 713-241-2067 or by email at [jim.sewell@shell.com](mailto:jim.sewell@shell.com).

A handwritten signature in black ink, appearing to read "H. James Sewell". The signature is fluid and cursive, with a long, sweeping flourish extending upwards and to the right.

H. James Sewell  
Environmental Manager, Attorney-in-fact



April 11, 2016

Shell Chemical Appalachia LLC

Ms. Rebecca Matsco.  
Chairman, Potter Twp. Board of Supervisors  
206 Mowry Road  
Monaca, PA 15061

Shell Oil Company  
One Shell Plaza  
910 Louisiana St.  
Houston, TX 77002  
United States of America  
Internet: www.shell.us

Re: Shell Chemical Appalachia LLC  
Petrochemicals Complex  
Monaca, Beaver County, Pennsylvania

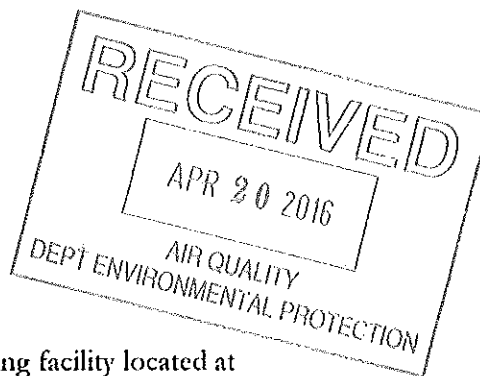
Dear Ms. Matsco:

The purpose of this notice is to inform you that Shell Chemical Appalachia LLC is submitting a modification application to Pennsylvania Department of Environmental Protection (PADEP) for Plan Approval No. 04-00740A to incorporate the Emission Reduction Credits (ERCs) specified in Plan Approval conditions #037 and #038. No other changes to the Plan Approval are being proposed at this time.

Plan Approval No.: 04-00740A  
Project: Petrochemicals Complex  
Applicant Name: Shell Chemical Appalachia LLC  
Applicant Contact: H. James Sewell  
Shell Chemical Appalachia LLC  
300 Franklin Road  
Monaca, PA 15061  
(713) 241-2067

Site Location: Former Horsehead Corporation zinc recycling facility located at  
300 Franklin Road, Monaca, Beaver County, Pennsylvania 15061

Municipality/County: Potter and Center Townships, Beaver County, PA



This letter is intended to satisfy the requirement of Pennsylvania Code 25 PA Code Section 127, Subchapter B, Plan Approval Requirements 127.43a, Municipal Notifications. Each applicant for a plan approval shall notify the local municipality and county where the air pollution source is to be located that the applicant has applied for the plan approval as required by section 1905-A of The Administrative Code 1929 (71 P.S. § 510.5).

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of the Shell Group

The 30-day comment period begins upon receipt of the notice by the municipality and county. Any comments should be addressed to Pennsylvania Department of Environmental Protection (PADEP), Southwest Regional Office.

PADEP, Southwest Regional Office  
400 Waterfront Drive  
Pittsburgh, PA 15222-4745

If you have any questions, please do not hesitate to contact me at 713-241-2067 or by email at [jim.sewell@shell.com](mailto:jim.sewell@shell.com).

Sincerely,

A handwritten signature in black ink, appearing to read "H. James Sewell". The signature is fluid and cursive, with a prominent initial "H" and "J".

H. James Sewell  
Environmental Manager, Attorney-in-fact

5.0

Approval Letters (PADEP) ERC  
Registry and Ownership



**pennsylvania**  
DEPARTMENT OF ENVIRONMENTAL PROTECTION

BUREAU OF AIR QUALITY

September 22, 2015

Mr. Edward J. Simpson  
Vice-President, Commercial  
Shell Chemical Appalachia LLC  
One Shell Plaza  
910 Louisiana  
Houston, TX 77002-4916

RE: Shell Chemical Appalachia LLC, Beaver County, PA

Dear Mr. Simpson:


This is in response to your letter to the PA Department of Environmental Protection (DEP), received on September 2, 2015, requesting an ownership change for Group #1 ERCs consisting of 9.00 tons per year (tpy) of Volatile Organic Compounds (VOCs), 899.60 tpy of Nitrogen Oxide (NO<sub>x</sub>), 1898.73 tpy of Sulfur Oxides (SO<sub>x</sub>), 44.26 tpy of Particulate Matter-10 (PM10), 24.05 tpy of Particulate Matter-2.5 (PM2.5) and 64.20 tpy of Carbon Monoxide (CO) Emission Reduction Credits (ERC), expiring on September 11, 2021, and Group #2 ERCs consisting of 64.00 (tpy) of VOCs, 211.00 tpy of NO<sub>x</sub>, 877.90 tpy of SO<sub>x</sub>, 308.84 tpy of PM10, 34.10 tpy of PM2.5 and 21705.20 tpy of CO ERCs, expiring on April 26, 2024, currently held by Horsehead Corporation, Beaver County, Pennsylvania, to Shell Chemical Appalachia LLC, Beaver County, Pennsylvania. The Group #1 ERCs were created from the shutdown sources of two coal-fired Boiler Units # 034 and # 035 at the GF Wheaton Power Plant and the Group #2 ERCs at the Monaca Zinc Smelter (24 emission sources) of this facility, located at Monaca, Beaver County, PA.

The DEP has approved your request to change the ownership of the two groups of ERCs above, totally 73.00 tpy of VOCs, 1110.60 tpy of NO<sub>x</sub>, 2776.63 tpy of SO<sub>x</sub>, 353.10 tpy of PM10, 58.15 tpy of PM2.5 and 21769.40 tpy of CO. The DEP ERC Registry system shall be revised accordingly. These ERCs are now available for use by Shell Chemical Appalachia LLC in accordance with the requirements of 25 Pa. Code Chapter 127. Please note that these ERCs will expire as use as offset on September 11, 2021, and April 26, 2024, respectively, if they are not used and included in a permit prior to the expiration date.

---

Rachel Carson State Office Building | P.O. Box 8468 | Harrisburg, PA 17105-8468

717.787.9702 | Fax 717.772.2303

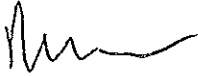
Printed on Recycled Paper 

[www.depweb.state.pa.us](http://www.depweb.state.pa.us)



If you have any questions or require additional information, please contact Stephen Todd by e-mail at [steptodd@pa.gov](mailto:steptodd@pa.gov) or by telephone at 717.787.4325.

Sincerely,



Krishnan Ramamurthy, Chief  
Division of Permits

cc: Mr. Ali Alavi, Horsehead Corporation  
Mr. Mark Gorog, Southwest Regional Office, (DEP)  
Mr. James M. Hensler, Horsehead Corporation  
Mr. Jim Sewell, Shell Chemical Appalachia LLC



# pennsylvania

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BUREAU OF AIR QUALITY

April 7, 2016

Mr. H. James Sewell  
Attorney-in-Fact  
Franklin Environmental Manager  
Shell Chemical Appalachia LLC  
300 Frankfort Road, (Shell Trailer)  
Monaca, PA 15061

Re: Transfer of Emission Reduction Credits from FirstEnergy Solutions Corporation, PA to Shell Chemical Appalachia LLC, PA

Dear Mr. Sewell:

This letter is in reference to your letter received on November 13, 2015, requesting the Pennsylvania Department of Environmental Protection (DEP) to transfer a total of 140 tons per year (tpy) of Particulate Matter 2.5 (PM2.5) Emission Reduction Credits (ERCs) from FirstEnergy Solutions Corporation to Shell Chemical Appalachia LLC. The PM2.5 ERCs are created from two plants of FirstEnergy Solutions Corp. (FirstEnergy) (f.k.a. Allegheny Energy Supply Company, LLC). The 49 tpy of PM2.5 ERCs were created from the Armstrong Power Plant, Unit 1, Armstrong County, PA., which was shut down on August 31, 2012. The 91 tpy of PM2.5 ERCs are created from Mitchell Power Plant, Unit 3, Washington County, PA, which was shut down on October 4, 2013. These ERCs are to be used at Shell Chemical Appalachia's facility, Potter Township, Beaver County, PA.

The DEP is approving your request to transfer a total of 140 tpy of PM2.5 ERCs from FirstEnergy Solutions Corporation's facilities to the Shell Chemical Appalachia facility on April 8, 2016 and the ERC Registry system revised accordingly. These ERCs are now available for use at the Shell Chemical Appalachia LLC Petrochemical Complex, Potter Township, Beaver County, PA, in accordance with the requirements of 25 Pa. Code § Chapter 127 (relating to construction, modification, reactivation and operation of sources).

Under 25 Pa. Code § 127.206(f), the 49 tpy of PM2.5 ERCs generated from the shutdown of units, will expire on August 31, 2022, and the 91 tpy of PM2.5 ERCs will expire on October 4, 2023, if the ERCs are not included in a plan approval or operating permit prior to the expiration dates. It is our understanding that you are working with Southwest Regional Office for securing a plan approval which will incorporate these ERCs as used.

If you have any questions or require additional information, please contact Stephen Todd at [Steptodd@pa.gov](mailto:Steptodd@pa.gov) or telephone 717.787.4325.

Sincerely,

Krishnan Ramamurthy  
Chief  
Division of Permits

---

Rachel Carson State Office Building | P.O. Box 8468 | Harrisburg, PA 17105-8468

717.787.9702 | Fax 717.772.2303

Printed on Recycled Paper

[www.dep.pa.gov](http://www.dep.pa.gov)

Mr. H. James Sewell

- 2 -

April 7, 2016

Enclosure

cc: Mr. Michael Jirousek, FirstEnergy Solutions Corporation  
Mr. Jeremy Burnham, Shell Chemical Appalachia LLC  
Mr. Jim Meehan, FirstEnergy Solutions Corporation  
Mr. Mark Gorog, Southwest Regional Office (DEP)



# pennsylvania

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BUREAU OF AIR QUALITY

March 24, 2016

Mr. H. James Sewell  
Attorney-in-Fact  
Environmental Manager  
Shell Chemical Appalachia, LLC  
One Shell Plaza, 910 Louisiana St.  
Houston, TX 77002

Re: Transfer of Emission Reduction Credits from FirstEnergy Solutions Corporation, PA to Shell Chemical Appalachia, LLC, PA

Dear Mr. Sewell:

This letter is in reference to your letter received on November 13, 2015, requesting the Pennsylvania Department of Environmental Protection (DEP) to transfer a total of 34.00 tons per year (tpy) of Volatile Organic Compounds (VOCs) Emission Reduction Credits (ERCs) from FirstEnergy Solutions Corporation to Shell Chemical Appalachia, LLC. The VOC ERCs are created from two plants of FirstEnergy Solutions Corp. (FirstEnergy) (f.k.a. Allegheny Energy Supply Company, LLC). The 10.18 tpy of VOC ERCs were created from the Armstrong Power Plant, Unit 1, Armstrong County, PA., which was shut down on August 31, 2012. The 10.82 tpy of VOC ERCs were created from Armstrong Power Plant, Unit 2, Armstrong County, PA, which was shut down on July 21, 2012. The 13.00 tpy of VOC ERCs are created from Mitchell Power Plant, Unit 3, Washington County, PA, which was shut down on October 4, 2013. These ERCs are to be used at Shell Chemical Appalachia's facility, Potter Township, Beaver County, PA.


The DEP is approving your request to transfer a total of 34.00 tpy of VOCs ERCs from FirstEnergy Solutions Corporation's facilities to the Shell Chemical Appalachia facility on March 23, 2016 and the ERC Registry system revised accordingly. These ERCs are now available for use at the Shell Chemical Appalachia LLC Petrochemical Complex, Potter Township, Beaver County, PA, in accordance with the requirements of 25 Pa. Code § Chapter 127 (relating to construction, modification, reactivation and operation of sources).

Under 25 Pa. Code § 127.206(f), the 10.18 tpy of VOCs ERCs generated from the shutdown of units, will expire on August 31, 2022, the 10.82 tpy of VOCs ERCs will expire on July 21, 2022 and the 13.00 tpy of VOCs ERCs will expire on October 4, 2023, if the ERCs are not included in a plan approval or operating permit prior to the expiration dates. It is our understanding that you are working with Southwest Regional Office for securing a plan approval which will incorporate these ERCs as used.

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Rachel Carson State Office Building | P.O. Box 8468 | Harrisburg, PA 17105-8468

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[www.dep.pa.gov](http://www.dep.pa.gov)

March 24, 2016

If you have any questions or require additional information, please contact Stephen Todd at [Steptodd@pa.gov](mailto:Steptodd@pa.gov) or telephone 717.787.4325.

Sincerely,



Krishnan Ramamurthy  
Chief  
Division of Permits

Enclosure

cc: Mr. Mark Gorog, Southwest Regional Office (DEP)  
Ms. Lauren Kisling, BGC Environmental Brokerage Services, L.P.  
Mr. Cooper Marlowe, Sonoco Products Company

6.0

Plan Approval Application Fee

193193

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CHECK DATE

April 11, 2016

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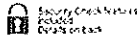
AMOUNT

\$3,400.00

TO COMMONWEALTH OF PENNSYLVANIA  
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Check Date: 4/11/2016

Invoice Number	Date	Voucher	Amount	Discounts	Previous Pay	Net Amount
041116	4/11/2016	2171841	\$3,400.00			\$3,400.00
COMMONWEALTH OF PENNSYLVANIA TOTAL			\$3,400.00			\$3,400.00
204 - AP DISB (CHECKS) - 15			0066016			