Shell Chemical Appalachia LLC
300 Frankfort Rd
Monaca, PA 15061

September 22, 2026

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
Potter and Center Townships, Beaver County
Plan Approval No. 04-00740A
Plan Approval Temporary Operation 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 Shell Polymers Monaca.

The following documents are included in the extension request:

- Plan Approval Extension Form (completed and signed)
- Air Pollution Control Act Compliance Review Supplemental Form (completed and signed)
- Justification for the extension
- Schedule for the completion of the construction

The extension request was submitted via Pennsylvania Department of Environmental Protection's (PADEP's) OnBase Electronic Forms Upload platform. The application fee of $900 for the application was paid via credit card through OnBase.

Please contact Alan Binder at 724-709-2506 or Alan.Binder@shell.com if you have any questions or need additional information.

Sincerely,

Nathan Levin
Operations Manager

2700-FM-BAQ0114 Rev. 2/2021
Form

pennsylvania
DEPARTMENT OF ENVIRONMENTAL PROTECTION

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF AIR QUALITY

PLAN APPROVAL EXTENSION FORM

Current Plan Approval Information			
Plan Approval No.: *04-00740A*	Owner Name: *Shell Chemical Appalachia LLC*		
Original Issued Date: *6/18/2015*	Plant Name: *Shell Polymers Monaca*		
Current Expiration Date: *10/28/2026*	Contact Name: *Laura Sabolyk*		
Project Commenced Date: *2/10/2016*	Contact Title: *Senior Regulatory Advisor*		
Contact Telephone: *225-201-5419*	Contact Email: *laura.l.sabolyk@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)

☒ **(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) 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).**

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

Checklist

☒ **Included Air Quality Fees Schedule**

☐ **Fees are not required in accordance with 25 Pa. Code § 127.702(i)(3); justification included**

☒ **Included justification for the extension request**

☒ **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**

☒ **Plan Approval Extension Form signed by a responsible official**

Certification of Truth, Accuracy and Completeness

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.

Name (Type): *Nathan Levin*	Title: *Operations Manager*
Name (Signed):	Date: 9-23-26

2700-PM-AQ0005 Rev. 6/2006

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 9/13/2024

Type of Submittal

☐ New Plan Approval ☐ New Operating Permit ☐ Renewal of Operating Permit
☒ Extension of Plan Approval ☐ Change of Ownership ☐ Periodic Submission (every six months)
☐ 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 15061
Telephone	225-201-5419
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.

☐ Individual ☐ Fictitious Name ☐ Association
☐ Municipality ☐ Partnership ☐ Syndicate
☐ Proprietorship ☐ Limited Partnership
☐ Public corporation ☐ Government Agency
☐ Private Corporation ☐ Joint Venture
☐ Municipal Authority ☒ Other Type of Business (specify) Limited Liability Company

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.

Unit Name	Principal Places of Business	State of Incorporation	Taxpayer ID	Relationship to Applicant
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.

Unit Name	Street Business	County and Municipality	Telephone No.	Relationship to Applicant
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
Nathan Levin Operations Manager Shell Chemical Appalachia LLC	Shell Chemical Appalachia LLC 300 Frankfort Road Monaca, PA 15061

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
3/31/2026	Shell Polymers Monaca	PA-04-00740A/B/C	Exceedances of 12-Month Emission Limitations for NOx [February 2026]	Notice of Violation	Pending	COA 09/04/2026
4/21/2026	Shell Polymers Monaca	PA-04-00740A/B/C	Exceedances of 12-Month Emission Limitations for NOx [March 2026]	Notice of Violation	Pending	COA 09/04/2026
5/26/2026	Shell Polymers Monaca	PA-04-00740A/B/C	Exceedances of 12-Month Emission Limitations for NOx [April 2026]	Notice of Violation	Pending	COA 09/04/2026
6/22/2026	Shell Polymers Monaca	PA-04-00740A/B/C	Exceedances of 12-Month Emission Limitations for NOx [May 2026]	Notice of Violation	Pending	COA 09/04/2026
8/3/2026	Shell Polymers Monaca	PA-04-00740A/B/C	Exceedances of 12-Month Emission Limitations for NOx [June 2026]	Notice of Violation	Pending	COA 09/04/2026
8/4/2026	Shell Polymers Monaca	PA-04-00740A/B/C	HP Ground Flare #1 Visible Emissions [June 13, 2026]	Notice of Violation	Corrected / 6/13/2026	COA 09/04/2026
8/24/2026	Shell Polymers Monaca	PA-04-00740A/B/C	Exceedances of 12-Month Emission Limitations for NOx [July 2026]	Notice of Violation	Pending	COA 09/04/2026
9/4/2026	Shell Polymers Monaca	PA-04-00740A/B/C	Site exceedances of the 12-month NOx emission limit. Furnace stack test exceedances, invalid tests, or late tests. Furnace CEMS exceedances. CVTO stack test exceedance. SCTO stack test exceedances and malfunction. HP Flare System visible emissions. MPGF visible emissions. Benzene Waste NESHAP total annual benzene waste, Combustion Turbine late tests. Combustion Turbine CEMS exceedances.	Consent Order and Agreement	Continuing	$15MM

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
2022 to present	Shell Polymers Monaca	PA-04-00740A/C	Maximum designed water circulation rate through the cogeneration cooling tower was greater than limit in permit.	Corrected. The designed water circulation rate through the cogeneration cooling tower was corrected in PA-04-00740D issued September 22, 2026.
Q4 2022 (Furnace 5) Q1-Q4 2023 (Furnaces 1-7) Q1-Q4 2024 (Furnaces 1-7)	Shell Polymers Monaca	PA-04-00740A/C	Ethane Cracking Furnaces CEMS Report: Reports required to be resubmitted due to inaccurate data from Density Analyzer B, resulting in inaccurate mass fuel gas consumption and resulting NOx and CO emissions.	Corrected. Density analyzer settings were corrected on November 19, 2024. As of 8/18/2025, PADEP approved use of Density Analyzer A for historical data, and quarterly CEMS reports must be re-submitted with "A" data when it is available and valid. Quarterly CEMS reports must be submitted for the Q4 2022 for Furnace 5 only, Q1-Q4 2023 for all furnaces, and Q1-Q4 2024 for all furnaces. Revised reports have been submitted and approved through Q4 2024 and accepted as of April 1, 2026.
2/1/2024 to present	Shell Polymers Monaca	PA-04-00740A/C	Site-wide NOx 12-month rolling limitation: The COA expired at the end of January 2024. Site remained non-compliant with emission limitation.	Corrected. The NOx 12-month limit was increased to match facility design and account for EMACT flare compliance in PA-04-00740D issued September 22, 2026.
5/23/2024 Test Date	Shell Polymers Monaca	PA-04-00740A/C	SCTO stack test results not compliant with emission limitations for NOx.	Continuing Deviation. SCTO burners replaced with compliant design emission rates as of May 25, 2026. Stack test demonstration of compliance is pending but to be scheduled in accordance with PA-04-00740D timeline.
7/1/2025 to 5/4/2026	Shell Polymers Monaca	PA-04-00740A/C	Cogeneration Unit 2: Combustion turbine and duct burner fuel flow meters were not calibrated sufficiently close in time to each other per output of USEPA's ECMPS system to establish a new fuel flow to load baseline and testing for continued quarterly quality assurance. The turbine fuel flow meter data became invalid starting in Q3 25. NOx and CO lb/hr calculated CEMS emissions do not meet valid data availability minimums until both meters are able to be recalibrated or replaced with newly calibrated meters within 1 calendar quarter of each other. Additional detail was provided on March 9, 2026, letter to the PADEP SWRO.	Corrected. The installed turbine and duct burner fuel flow meters were replaced with new calibrated meters during planned Cogen Unit 2 downtime, which commenced in April 2026. The combustion turbine restarted on May 1, 2026, with duct burners restarted on May 4, 2026.

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
SCTO Downtime: 5/2026: ~196 hrs FEORs/ROT Blower Downtime: 3/2026: ~0.6 hrs 5/2026: ~70 hrs 6/2026: ~0.2 hrs Spent Caustic Blower Downtime: 3/2026: ~1.4 hrs 5/2026: ~ 184 hrs 6/2026: ~0.2 hrs	Shell Polymers Monaca	PA-04-00740A/C RFD 10277; Approval Date 8/9/2023 for WEMCO/EC-15	SCTO Blower Downtime. Small amounts of excess emissions from FEOR A/B, recovered oil, spent caustic storage tanks, and temporary WEMCO and EC-15 Units due to blower issues where emissions did not go to the SCTO. The tanks are internal floating roof tanks with minimal uncontrolled emissions.	Corrected after each incident. Planned downtime for SCTO burner replacement May 2026.
3/29/2026	Shell Polymers Monaca	PA-04-00740A/C	Cogeneration Units: NH3 Excess Emissions on Cogen 2	Corrected after incident.
3/29/2026 6/4/2026 6/12/2026	Shell Polymers Monaca	PA-04-00740A/C	Cracking Furnaces: Exceeded NOx 6.2 lbs/hr during decoking, hot steam standby, feed in or feed out: 3/29/2026 Furnace 5: 1 hr 6/4/2026 Furnace 2: 1 hr 6/12/2026 Furnace 5: 1 hr	Corrected after each incident. Each deviation has been or will be addressed in quarterly excess emission reports.
4/6/2026	Shell Polymers Monaca	PA-04-00740A/C	Cracking Furnaces: Exceeded NH3 10 ppmvd at 3% O2, daily average: 4/6/2026 Furnace 7	Corrected after each incident.
6/9/2026	Shell Polymers Monaca	PA-04-00740A/C	Visible Emissions TEGF A. Visible emissions > 5 minutes in consecutive 2 hours for each flare.	Corrected.
6/11/2026	Shell Polymers Monaca	PA-04-00740A/C	Cracking Furnaces: Exceeded NOx 31.1 lbs/hr during startup or shutdown: 6/11/2026 Furnace 5: 1 hr	Corrected after each incident. Each deviation has been or will be addressed in quarterly excess emission reports.
6/11/2026	Shell Polymers Monaca	PA-04-00740A/C	Cogeneration Units: Exceeded NOx 2 ppmvd at 15% O2 as detailed below: Unit 2: 1 hr on 6/11/2026	Corrected after each incident. Each deviation has been or will be addressed in quarterly excess emission reports.
6/13/2026	Shell Polymers Monaca	PA-04-00740A/C	Visible Emissions TEGF A. Visible emissions > 5 minutes in consecutive 2 hours for each flare.	Corrected. See Malfunction Report dated 7/9/2026.

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.

Signature	Date
	9-23-26

Nathan Levin

Name (Print or Type)

Operations Manager

Title

Attachment A
Plan Approval Extension Justification

Shell is required to request an extension of the plan approvals until the Title V Operating Permit (TVOP) is issued. In accordance with PA-04-00740A, Section B, Condition #003 (d), Shell is requesting an extension of the 180-day shakedown period to continue temporary operation of sources that have commenced operation. PA-04-00740A was first issued on June 18, 2015, and PA-04-00740B and C were issued on February 18, 2021, with all three permits expiring on October 28, 2026.

Shell submitted the initial *Title V Operating Permit Application* to PADEP on June 19, 2024, in response to a February 22, 2024, letter from PADEP requiring the submission of a TVOP application by June 21, 2024. Then, on September 13, 2024, Shell submitted a *Plan Approval Application* to PADEP to i) propose permanent Wastewater Treatment Plant (WWTP) controls, ii) request incorporation of the appropriate Ethylene Maximum Achievable Control Technology (EMACT) requirements into the permit, and iii) reconcile specific plan approval source descriptions, potential-to-emit calculations, and conditions within the permit. Since the submission of the applications, Shell has participated in numerous meetings with PADEP and has submitted additional data as requested by PADEP. The TVOP application was updated and resubmitted on January 21, 2026, in response to technical deficiency notice from PADEP and to incorporate content from the September 2024 plan approval application. PA-04-00740D has been issued on September 22, 2026. As of the date of submission of this extension application, a TVOP has not been issued.

Therefore, Shell is requesting an extension of the Plan Approvals A, B and C until a TVOP is issued by PADEP in response to the application submitted in June 2024 and updated in January 2026.

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		July 6, 2022	July 30, 2022, lit burners to start dry out. Ethane feed in Sep. 5, 2022.
032	Ethane Cracking Furnace #2		July 6, 2022	May 27, 2022, lit burners to start dry out. Ethane feed in Sep. 13, 2022
033	Ethane Cracking Furnace #3		July 6, 2022	June 1, 2022, lit burners to start dry out. Ethane feed in Sep. 6, 2022
034	Ethane Cracking Furnace #4		July 6, 2022	August 17, 2022, lit burners to start dry out. Ethane feed in Sep. 17, 2022
035	Ethane Cracking Furnace #5		July 6, 2022	May 12, 2022, lit burners to start dry out. Ethane feed in Sep. 5, 2022
036	Ethane Cracking Furnace #6		July 6, 2022	May 6, 2022, lit burners to start dry out. Ethane feed in Sep. 25, 2022
037	Ethane Cracking Furnace #7		July 6, 2022	April 14, 2022, lit burners to start dry out. Ethane feed in Sep. 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
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	Sep 2021
C101A		Oxidation Catalyst (Unit #1)	July 2021	Sep 2021
C102		SCR (Unit #2)	July 2021	August 2021
C102A		Oxidation Catalyst	July 2021	August 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
		(Unit #2)		
C103		SCR (Unit #3)	July 2021	Sep 2021
C103A		Oxidation Catalyst (Unit #3)	July 2021	Sep 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[a]	Diesel-Fired Emergency Generator Engines (2)		March 2, 2020	March 2, 2020
106	Fire Pump Engines (2)		Dec 4, 2020	Dec 4, 2020,
107[a]	Natural Gas-Fired Emergency Generators (3)		March 2, 2020	March 2, 2020
201	Ethylene Manufacturing Line		July 6, 2022	September 7 2022 feed into ECU
202[b]	Polyethylene Manufacturing Lines		July 6, 2022	See Note b
C202[b]		Particulate Filters (PE MFG)	July 6, 2022	See Note b
203	Process Cooling Tower(s)		July 6, 2022, including chemical cleaning and passivation activities	September 7 2022 feed into ECU
C203		Drift Eliminators (Process Cooling Tower)	July 6, 2022	September 7 2022 feed into ECU
204	Low Pressure (LP) Header System		May 16, 2022	May 16, 2022
C204		LP System	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		May 12, 2022	May 12, 2022
C205		HP System	May 12, 2022	May 12, 2022
C205A		HP Ground Flare	March 16, 2022. Lit pilots for testing	March 16, 2022
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

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
C206		Spent Caustic Vent Incinerator	Construction completed, refractory dry out started May 18, 2022, re lit June 7, 2022 for operation	June 7, 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)		July 6, 2022	May 24, 2023
303	Liquid Loadout (Pyrolysis Fuel Oil, Light Gasoline)		July 6, 2022	December 16, 2022 (PFO) March 21, 2023 (Light Gasoline)
304	Liquid Loadout (C3+)		July 6, 2022	September 9, 2022
305	Liquid Loadout (Coke Residue/Tar)		July 6, 2022	March 14, 2023 1st load out of blended pitch from ECU
401	Storage Tanks (Recovered Oil, Equalizations Wastewater)		April 30, 2021	April 30, 2021
402	Storage Tank (Spent Caustic)		July 6, 2022	August 18, 2022
403	Storage Tanks (Light Gasoline)		July 6, 2022	February 3, 2022
404	Storage Tanks (Hexene)		May 31, 2022	May 31, 2022 (Tank B) and June 26, 2022 (Tank A)
405	Storage Tanks (Misc Pressurized/ Refrigerated)		May 12, 2022	5/12/2022
406	Storage Tanks (Diesel Fuel > 150 gallons)		December 4, 2020	December 4, 2020
C406[c]		Carbon Canisters (Diesel Storage Tanks)	Construction has not commenced	See Note c
407	Storage Tanks (Pyrolysis Fuel Oil)		July 6, 2022	November 8, 2022
408	Storage Tanks (Diesel Fuel < 150 gallons)		March 2, 2020	March 2, 2020
409	Methanol Storage Vessels and Components		May 12, 2022	May 12, 2022
501[b]	Equipment Components		July 6, 2022	First pellets made at PE3 November 21, 2022, last PE unit to start. All areas have LDAR

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
502	Wastewater Treatment Plant		April 30, 2021	April 30, 2021
N/A	Induced Nitrogen Floatation Units covered under RfDs • RfD 10119 Approval Date 4/10/2023 • RfD 10277 Approval Date 8/9/2023	Spent Caustic Vent Incinerator	Wemco INF: May 1, 2023 EC15 INF: November 19, 2023	Wemco INF: May 1, 2023 EC15 INF: November 19, 2023
503	Plant Roadways		Started paving in October 2020	Completed site paving June 5, 2023
504	SF6 High Voltage Switchgear		November 12, 2019	November 12, 2019

[a] Source 105, 107 engines covered by RfD 8259

[b] PE1 Unit commissioned on October 1, 2022. PE2 Unit commissioned on November 1, 2022. PE3 Unit initially attempted commissioning November 21, 2022, but experienced equipment design deficiencies and was shut down since March 25, 2023, following limited commissioning attempts. PE3 Unit was re-commissioned and produced polyethylene on February 23, 2024.

[c] No applicable storage tank installed for requirement to apply