

Shell Chemical Appalachia LLC 300 Frankfort Rd. HECENCED PA 15061

November 27, 2023

Mr. Ryan Decker Clean Water Program PA Department of Environmental Protection Southwest Regional Office 400 Waterfront Drive Pittsburgh, PA 15222

NOV 2 8 2023

CLEAN WATER DEP, SOUTHWEST REGIONAL OFFICE

RE:

Water Quality Management (WQM) Permit 0417201 Amendment Shell Chemical Appalachia LLC

Beaver County, Pennsylvania

Dear Mr. Decker:

Shell Chemical Appalachia LLC ("Shell") has installed new temporary equipment was installed in the Wastewater Treatment Plant (WWTP) under a Temporary Discharge Authorization (TDA) approved by the Department on June 21, 2023. The equipment is to aid in the removal of oil and gas and VOCs from the off-spec wastewater before routing to Biotreaters.

The enclosed amendment is to add this temporary equipment into our existing WQM permit until permanent equipment can be installed. However, at this point the plant is not fully operational (about 70%) and as with any new facility, evaluations/modifications are being conducted to try and optimize operations. It is Shell's intent to operate these systems throughout the startup process (including during initial full operations) to obtain data and evaluate potential operational changes to engineer the permanent equipment for the WWTP. Once the evaluation process is complete, Shell will present this information to the Department to determine proper permitting steps for any final design.

Condition 12 of the TDA states that the TDA will expire on January 5, 2024, unless Shell submits a written request to the Department to extend the letter TDA approval. Please consider this letter/application as Shell's written request to extend the TDA approval period, if needed until the WQM permit is amended.

Shell is requesting the ability to operate this equipment until the Department reviews and issues the amended WQM permit. Please let us know if there is any issue with extending the TDA until an amended WQM is issued as operating the temporary equipment is critical to help meet compliance requirements.

If you have any questions or require additional information, please contact me at kimberly kaal@shell.com or 724.709.2467.

Sincerely,

Kaal

Kimberly Kimberly Kaal DN: cn=Kimberly Kaal DN: cn=Kimberly Kaal Date: 2023.11.21 13:34:10 -05'00'

Kimberly Kaal Environmental Manager, Attorney-in-Fact Shell Chemical Appalachia LLC

Enclosures - WQM Application including Engineers Report

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Section 1

General Information Form (GIF)

0210-PM-PIO0001 Rev. 10/2020 Application



COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION

NOV 28 2023

CLEAN WATER

GENERAL INFORMATION FORM — AUTHORIZATION APPLICATION REGIONAL OFFICE

Before completing this General Information Form (GIF), read the step-by-step instructions provided in this application package. This form is used by the Department of Environmental Protection (DEP) to inform our programs regarding what other DEP permits or authorizations may be needed for the proposed project or activity. This version of the General Information Form (GIF) must be completed and returned with any program-specific application being submitted to the DEP.

		DEP USE ONLY						
Client ID# 31	Related ID#s (If Kn 1950	APS ID#			Date Received & General Notes			
Site ID# 10	Auth ID#							
Facility ID#								
		CLIENT INFO	RMATI	ON				
DEP Client ID#	Clien	t Type / Code			n & Brads	treet ID#		
311950	LLC							
	n Name or Registered	Fictitious Name		Employer II)# (EIN)			
Shell Chemical App	palachia LLC		4	6-1624986		☐ Yes	\boxtimes	NO
State of Incorpora	tion or Registration o	f Fictious Name	0.5	oration ⊠ Proprietorsh		Partnershi Associatio		
				e/Trust				
Individual Last Na	me	First Name	ľ	ΛI	Suffix	<		
Additional Individ	ual Last Name	First Name	Ŋ	/II	Suffix	(
Mailing Address L	ine 1		Mailing	Address Li	ne 2	7		*
300 Frankfort Rd	0''	04-4-	_	7ID : 4	0			
Address Last Line Monaca	e – City	State PA		ZIP+4 5061		ountry eaver		
Client Contact Las	st Name	First Name		10001	MI		uffix	
Kaal	ot manio	Kimberly						
Client Contact Tit			Phone		Ext	С	ell Phor	ne .
	nager (Attorney-in-Fact)		724-709)-2467	FAV			
Email Address Kimberly.kaal@sh	ell com				FAX			
Killiberry.kaai@sir	eli.com	SITE INFOR	ONA A TIC	NAL				
DED 014 ID#	014 N	SHEINFOR	KIVIA I IC	/N				
DEP Site ID# 102360	Site Name Shell Polymers Mona	aca Sita						
EPA ID#		mated Number of	Fmploye	es to he P	resent at	Site		
Description of Sit		mateu Hamber of	Linkiej	000 10 80 1	roooni ac	O.CO		
Petrochemical Con								
Tax Parcel ID(s):		1.46						
County Name(s)		ality(ies)	1		City	Boro	Twp	State
Beaver	Potter					_		PA
					$+$ \vdash \vdash			
					+ $+$ $+$	-H		
Site Location Line	. 1		Sita Loca	tion Line 2				
300 Frankfort Rd	, 1	•	one Loca	uon Line Z				
Site Location Las	t Line – Citv	9	State	ZIP+4				
Monaca			PA	15061				
Detailed Written D	Directions to Site							
	ternational Airport – 370	6 North to Exit 39 (I	Monaca),	turn left on	to Rt 18 Sc	outh and p	roceed	for 1.5
miles then turn rig	ht at light into plant							

0210-PM-PIO0001 Rev. 10/2020 Application

Site (Contact Last Name	First I Kimbe			MI	S	uffix
Site 0	Contact Title	Tarribe		ontact Firm			*
	onmental Manager (Attorney-in-Fact)	Shell				
300 F	ng Address Line 1 rankfort Rd		Mailin	ıg Address L	ine 2		
Maili r Mona	ng Address Last Line – City		State PA	ZIP+4 15061			
Phon		AX		Address			
724-7	09-2467			erly.kaal@sh	ell.com		
	S Codes (Two- & Three-Digit Codes -	List All That A	pply)		-Digit Code	(Optional)	
32 an						, ,	
OWN	t to Site Relationship						
		FACILIT	Y INFORM	MATION			
	ication of Existing Facility					Yes	No
1.	Will this project modify an existi	ng facility, s	system, or a	ctivity?		\boxtimes	
2.	Will this project involve an addit	ion to an ex	isting facilit	ty, system, o	r activity?	\boxtimes	
	If "Yes", check all relevant facility t	ypes and pro	vide DEP fa	cility identifica	ation numbei	rs below.	
	Facility Type	DEP Fac I	D#	Facility Type		DE	P Fac ID#
	Air Emission Plant			Industrial Miner	als Mining Oper		I Tuo ID#
H	Beneficial Use (water)			Laboratory Loca			
H	Blasting Operation Captive Hazardous Waste Operation			Land Recycling			
Ц	Captive Hazardous Waste Operation		ш	Mine Drainage Recycling Proje	Treatment / Lan	ıd	
	Coal Ash Beneficial Use Operation			Municipal Wast		-	
	Coal Mining Operation			Oil & Gas Encre	achment Locat	ion	
H	Coal Pillar Location		📙	Oil & Gas Local			
H	Commercial Hazardous Waste Operation Dam Location		—— H	Oil & Gas Wate		acility	
H	Deep Mine Safety Operation -Anthracite	-	— H	Public Water Su Radiation Facili			
	Deep Mine Safety Operation -Bituminous		— Н	Residual Waste			
	Deep Mine Safety Operation -Ind Minerals			Storage Tank L	ocation		
H	Encroachment Location (water, wetland)		\boxtimes	Water Pollution		41	7201
H	Erosion & Sediment Control Facility Explosive Storage Location	•	📙	Water Resource	•		
	Explosive Storage Location		⊔	Other:		-	
	Latitude/Longitude		Latitude			Longitude	
	Point of Origin	Degrees	Minutes	Seconds	Degrees	Minutes	Seconds
	-	40	40	17	80	20	10
Horizo	ontal Accuracy Measure	Feet 18		or	Me	ters	
Horizo	ontal Reference Datum Code	☐ Nort	h American	Datum of 192			
			h American	Datum of 198	3		
			d Geodetic	System of 19	84		
	ontal Collection Method Code	eMAP					
Altitud	ence Point Code	CNTAR					
	de Datum Name	Feet	N-4:I O-	or		ters	
Aititut	de Datum Name			odetic Vertical			
Altitud	le (Vertical) Location Datum Colle		d Code	can Vertical [SRVEY	Jaluiii Oi 198	OO (NAVDOO)	
	etric Type Code	POINT	u ooue	UNVLI			
	Collection Date						
	e Map Scale Number		Inch(es)	=		Feet	
	<i>O</i> r		Centimete	r(s) =		Meters	S

			PRO	DJECT INFORM	NOITAI					
roje	ect Name									
	fication of Wate		nit 417201							
Proje	ect Description	1		1.6	Lava Cara					
				removal from was	twater	N.	/II		Suffix	
Proje	ect Consultant	Last Name		First Name		IV.	/11		Julia	
Proje	ect Consultant	Title		Consulti	ng Firm					
Maili	ng Address Li	ne 1		Mailing	Address	Line 2				
Λddr	ress Last Line	– City		State			ZIP+4			
					Adduss					
Phor	ne	Ext	FAX	Email	Address					
Time	Schedules	Project	Milestone (C	optional)					1 411	
1.	Is the project of an Env defined by D	ironmental	or within a 0.9 Justice cor	5-mile radius nmunity as		Yes	\boxtimes	No		
)	To deterr	nine if the proj	ect is located ir al Justice Areas	or within a 0.5-mile Viewer.	radius of a	an envii	ronment	al justice co	ommunity	, please use
2.	Have you in prior to so	ubmitting	surrounding the applicat	community ion to the		Yes		No		, 76 90 - 12
	Mothod of n	otification: N	Aunicipal notific	ation letters						
3.	Have you a	ddressed c	ommunity co	oncerns that		Yes		No		N/A
	If no, ple	ase briefly des	cribe the comm	unity concerns that h	ave been e	express	sed and	not address	sea.	
1	le vour proi	act fundad h	y state or fed	eral grants?	П	Yes	\boxtimes	No	11 11 1	7
4.	Note: If "Ye	s", specify wha rant expiration	t aspect of the	project is related to the	ne grant an				, contact	person
	Asneo	t of Project Re	lated to Grant							
5.	Is this ap Appendix A referenced	plication for A of the L list, see App	or an autho and Use Po pendix A of t	orization on		Yes		No		
	Policy attac	hed to GIF in	istructions)	a is not subject to the	I and I lea	Policy				
	Note: If "No	to Question 5	o, <u>the application</u> 5. the application	n is not subject to the on is subject to this p	olicy and th	ne Anni	licant sh	ould answe	r the add	itional
)	quest	ions in the Lar	o, the application of Use Informa	tion section.	oney und th	.o , ippi				

	LAND LICE INCORMATION				
Notes	LAND USE INFORMATION				
Note:		evidence	of comp	oliance	with local
1.	renensive plans and zoning ordinances.				
2.	Is there an adopted county or multi-county comprehensive plan?	\boxtimes	Yes		No
3.	Is there a county stormwater management plan?		Yes		No
	Is there an adopted municipal or multi-municipal comprehensive plan?	\boxtimes	Yes		No
4.	Is there an adopted county-wide zoning ordinance, municipal zoning ordinance or joint municipal zoning ordinance?	\boxtimes	Yes		No
	Note: If the Applicant answers "No" to either Questions 1, 3 or 4, the provisions of Applicant does not pood to reprod to great the second to	of the DA M	IDC oro no	st appli	والماموم
	Applicant does not need to respond to dijestions a and a holow				
	If the Applicant answers "Yes" to questions 1, 3 and 4, the Applicant should	d respond t	to question	ns 5 an	d 6 below.
5.	Does the proposed project meet the provisions of the zoning	\boxtimes	Yes		No
	ordinance or does the proposed project have zoning approval? If			,	
6.	zoning approval has been received, attach documentation.				
· · · · · · · · · · · · · · · · · · ·	Have you attached Municipal and County Land Use Letters for the project?	\boxtimes	Yes		No
	COORDINATION INFORMATION				
I COIII	The PA Historical and Museum Commission must be notified of proposed ical Guidance Document 012-0700-001 utilizing the Project Review Form .				
If the operat	activity will be a mining project (i.e., mining of coal or industrial mineration of a coal or industrial minerals preparation/processing facility), respond	ls, coal re	efuse disp	oosal	and/or the
If the	activity will not be a mining project, skip questions 1.0 through 2.5 and be	o quobiloi		ougii i	z.o below.
1.0	Is this a coal mining project? If "Yes", respond to 1.1-1.6. If "No", skip				
1.1	to Question 2.0.		Yes	\boxtimes	No
1.1	Will this coal mining project involve coal preparation/ processing		Yes		No
	activities in which the total amount of coal prepared/processed will				
1.2	be equal to or greater than 200 tons/day?				
1.2	Will this coal mining project involve coal preparation/ processing	□ '	Yes		No
	activities in which the total amount of coal prepared/processed will be greater than 50,000 tons/year?				
1.3	Will this coal mining project involve coal preparation/ processing		/		
	activities in which thermal coal dryers or pneumatic coal cleaners		res .		No
	will be used?				
1.4	For this coal mining project, will sewage treatment facilities be		/es		No
	constructed and treated waste water discharged to surface waters?	Ц ,	168	Ш	No
1.5	Will this coal mining project involve the construction of a permanent		'es		No
	impoundment meeting one or more of the following criteria: (1) a	ъ.	00		NO
	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?				
1.6	Will this coal mining project involve underground coal mining to be	□ Y	'es		No
	conducted within 500 feet of an oil or gas well?	_		_	
2.0	Is this a non-coal (industrial minerals) mining project? If "Yes",	□ Y	'es		No
0.4	respond to 2.1-2.6. If "No", skip to Question 3.0.				
2.1	Will this non-coal (industrial minerals) mining project involve the	□ Y	'es		No
	crushing and screening of non-coal minerals other than sand and				
2.2	gravel?				
2.2	Will this non-coal (industrial minerals) mining project involve the	Y	es		No
	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?				

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)?	Yes	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?	Yes	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?	Yes	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.	Yes	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)?	Yes	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> .	Yes	No
3.3	Will the oil- or gas-related project involve the construction and operation of industrial waste treatment facilities?	Yes	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	Yes	No
	4.0.2 Will the project discharge or drain to a special protection water (EV or HQ) or an EV wetland?	Yes	No
	4.0.3 Will the project involve a construction activity that results in earth disturbance in the area of the earth disturbance that are contaminated at levels exceeding residential or non-residential medium-specific concentrations (MSCs) in 25 Pa. Code Chapter 250 at residential or non-	Yes	No
5.0	residential construction sites, respectively? Does the project involve any of the following: water obstruction and/or encroachment, wetland impacts, or floodplain project by the Commonwealth/political subdivision or public utility? If "Yes", respond to 5.1-5.7. If "No", skip to Question 6.0.	Yes	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?	Yes	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?	Yes	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?	Yes	No
5.4	Is your project an interstate transmission natural gas pipeline?	Yes	No

5.5	Does your project consist of linear construction activities which result in earth disturbance in two or more DEP regions AND three or more counties?		Yes		No	(
5.6	Does your project utilize Floodplain Restoration as a best management practice for Post Construction Stormwater Management?		Yes		No				
5.7	Does your project utilize Class V Gravity / Injection Wells as a best management practice for Post Construction Stormwater Management?		Yes		No	-			
6.0	Will the project involve discharge of construction related stormwater to a dry swale, surface water, ground water or separate storm water system?		Yes		No	-			
6.1	Will the project involve discharge of industrial waste stormwater or wastewater from an industrial activity or sewage to a dry swale, surface water, ground water or an existing sanitary sewer system or separate storm water system?		Yes		No	-			
7.0	Will the project involve the construction and operation of industrial waste treatment facilities?		Yes		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.		Yes		No	_			
9.0	8.0.1 Estimated Proposed Flow (gal/day) Will the project involve the subdivision of land, or the generation of		Yes	\boxtimes	No				
	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?		165	М	NO	ĺ			
	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.		Yes		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).		Yes		No	-			
	10.0.1 Gallons Per Year (residential septage) 10.0.2 Dry Tons Per Year (biosolids)								
11.0	Does the project involve construction, modification or removal of a dam? If "Yes", identify the dam. 11.0.1 Dam Name		Yes		No				
12.0	Will the project interfere with the flow from, or otherwise impact, a dam? If "Yes", identify the dam. 12.0.1 Dam Name		Yes		No	-			
13.0	Will the project involve operations (excluding during the construction period) that produce air emissions (i.e., NOX, VOC, etc.)?		Yes		No	_			
	13.0.1 If "Yes", is the operation subject to the agricultural exemption in 35 P.S. § 4004.1?		Yes	\boxtimes	No				
	13.0.2 If the answer to 13.0.1 is "No", identify each type of emission followed by the estimated amount of that emission. Enter all types & amounts of emissions; separate each set with semicolons. Although the unit itself is a minor source, it will decrease actual overall plant emissions by routing additional hydrocarbons to a permitted air pollution control device. See RFD 10277 submitted to Bureau of Air Quality on 06/16/2023 and revised on 7/29/2023.								

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.		Yes		No	
	14.0.1 Number of Persons Served 14.0.2 Number of Employee/Guests					
	14.0.3 Number of Connections					
	14.0.4 Sub-Fac: Distribution System		Yes		No	
	14.0.5 Sub-Fac: Water Treatment Plant		Yes		No	
	14.0.6 Sub-Fac: Source		Yes		No	
	14.0.7 Sub-Fac: Pump Station		Yes		No	
	14.0.8 Sub Fac: Transmission Main		Yes		No	
	14.0.9 Sub-Fac: Storage Facility		Yes		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,		Yes	\boxtimes	No	
40.0	spring or infiltration gallery? Is your project to be served by an existing public water supply? If		Yes	\boxtimes	No	-
16.0	"Yes", indicate name of supplier and attach letter from supplier stating	ш	100		140	
	that it will serve the project. 16.0.1 Supplier's Name					
	16.0.2 Letter of Approval from Supplier is Attached		Yes	\boxtimes	No	
17.0	Will this project be served by on-lot drinking water wells?		Yes	\boxtimes	No	
18.0	Will this project involve a new or increased drinking water		Yes	\boxtimes	No	
10.0	withdrawal from a river, stream, spring, lake, well or other water bod(ies)? If "Yes", reference Safe Drinking Water Program. 18.0.1 Source Name					
19.0	Will the construction or operation of this project involve treatment,		Yes	\boxtimes	No	
)19.0	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. 19.0.1 Type & Amount			_		
20.0	Will your project involve the removal of coal, minerals, contaminated media, or solid waste as part of any earth disturbance activities?		Yes		No	
21.0	Does your project involve installation of a field constructed		Yes	\boxtimes	No	
21.0	underground storage tank? If "Yes", list each Substance & its Capacity. Note: Applicant may need a Storage Tank Site Specific Installation Permit. 21.0.1 Enter all substances & capacity of each; separate each set with semicolons.			,		
22.0	Does your project involve installation of an aboveground storage		Yes	\boxtimes	No	
22.0	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. 22.0.1 Enter all substances & capacity of each; separate		100			
	each set with semicolons.		Von	\square	No	
23.0	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	M	No	
	23.0.1 Enter all substances & capacity of each; separate					
	each set with semicolons.					

Application 24.0 Does your project involve installation of a storage tank at a new Yes 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. 24.0.1 Enter all substances & capacity of each; separate each set with semicolons. NOTE: If the project includes the installation of a regulated storage tank system, including diesel emergency generator systems, the project may require the use of a Department Certified Tank Handler. For a full list of regulated storage tanks and substances, please go to www.dep.pa.gov search term storage tanks 25.0 Will the intended activity involve the use of a radiation source? 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. For applicants supplying an EIN number: I am applying for a permit or authorization from the Pennsylvania Department of Environmental Protection (DEP). As part of this application, I will provide DEP with an accurate EIN number for the applicant entity. By filing this application with DEP, I hereby authorize DEP to confirm the accuracy of the EIN number provided with the Pennsylvania Department of Revenue. As applicant, I further consent to the Department of Revenue discussing the same with DEP prior to issuance of the Commonwealth permit or authorization. Type or Print Name Kimberly Kaal Environmental Manager (Attorney-in-Fact) November 6, 2023 Title

Date

0210-PM-PIO0001 Rev. 10/2020

Section 3

Acts 14/67/68/127 Notifications and Receipts

- Beaver County
- Potter Township



Shell Chemical Appalachia LLC 300 Frankfort Road Monaca, PA 15061

November 6, 2023

Daniel C. Camp III Chairman, Beaver County Commissioners Beaver County Courthouse 810 Third Street Beaver, PA 15009

Dear Mr. Camp,

This notice is to inform you of Shell Chemical Appalachia LLC's intent to submit an amendment to Water Quality Management Permit (No. 0417201) to the Pennsylvania Department of Environmental Protection (PADEP) with the Permitting and Technical Services Section, Bureau of Water Standards and Facility Regulations for the following project:

Project:

Amend Water Quality Management Permit (No. 0417201) to add equipment to enhance

hydrocarbon removal from wastewater

Applicant Name:

Shell Chemical Appalachia LLC

Project Location:

300 Frankfort Road, Monaca, PA 15061

Applicant Contact:

Kimberly Kaal

Shell Chemical Appalachia LLC

300 Frankfort Road

Monaca, Beaver County, Pennsylvania 15061

Municipality/County:

Potter Township, Beaver County, PA

This letter is intended to satisfy the requirements of Pennsylvania Acts 14, 67, 68, and 127 and the Pennsylvania Municipalities Planning Code. Section 1905-A of the Commonwealth Administrative Code as amended by Act 14, requires that each applicant for a PADEP permit must give written notice to the municipality(ies) and the county(ies) in which the permitted activity is located. The written notices shall be received by the municipality(ies) and county(ies) at least 30 days before the PADEP may issue or deny the permit.

Acts 67 and 68, which amended the Municipalities Planning Code to support sound land use practices and planning efforts, direct state agencies to consider comprehensive plans and zoning ordinances when reviewing applications for permitting of facilities or infrastructure, and specify that state agencies may rely upon comprehensive plans and zoning ordinances under certain conditions as described in Sections 619.2 and 1105 of the Municipalities Planning Code.

Enclosed are the completed General Information Form (GIF) for this project. PADEP invites you to review the attached information and comment on the land use aspects of this project; please be specific to PADEP when identifying any areas of conflict. If you wish to submit comments for PADEP to consider in a land use review of this project, you must respond within 30 days to the PADEP regional office listed below. If no land use comments are received by the end of the comment period, PADEP will assume that there are not substantive land use conflicts and proceed with the normal application review process.

Please submit any comments concerning this project within 30 days from the date of receipt of this letter to the PADEP, Southwest Regional Office, Bureau of Water Standards and Facility Regulation, 400 Waterfront Drive, Pittsburgh, PA 15222-4745.

For more information about the land use review process, please visit www.depweb.state.pa.us, (keyword: Land Use Reviews). For more information about this project, please contact me at 724.709.2467.

Sincerely,

Kimberly Kaal

Environmental Manager Shell Polymers PA

Enclosures:

Completed GIF



Dear Customer,

The following is the proof-of-delivery for tracking number: 774137028048

Delivery Information:

Status:

Delivered

Delivered To:

Receptionist/Front Desk

Signed for by:

C.COOK

Delivery Location:

Service type:

FedEx Standard Overnight

Special Handling:

Deliver Weekday

BEAVER, PA,

Delivery date:

Nov 17, 2023 08:37

Shipping Information:

Tracking number:

774137028048

Ship Date:

Nov 16, 2023

Weight:

0.5 LB/0.23 KG

Recipient:

Shipper:

BEAVER, PA, US,

Pittsburgh, PA, US,

Reference

60694528

FedEx Express proof-of-delivery details appear below; however, no signature is currently available for this shipment. Please check again later for a signature.



November 17, 2023

Shell Chemical Appalachia LLC One Shell Plaza 910 Louisiana Street Houston, TX 77002

Rebecca Matsco Chairwoman, Potter Township Supervisors 206 Mowry Road Monaca, PA 15061

Dear Ms. Matsco,

This notice is to inform you of Shell Chemical Appalachia LLC's intent to submit an amendment to Water Quality Management Permit (No. 0417201) to the Pennsylvania Department of Environmental Protection (PADEP) with the Permitting and Technical Services Section, Bureau of Water Standards and Facility Regulations for the following project:

Project:

Amend Water Quality Management Permit (No. 0417201) to add equipment to enhance

hydrocarbon removal from wastewater

Applicant Name:

Shell Chemical Appalachia LLC

Project Location:

300 Frankfort Road, Monaca, PA 15061

Applicant Contact: Kimber

Kimberly Kaal

Shell Chemical Appalachia LLC

300 Frankfort Road

Monaca, Beaver County, Pennsylvania 15061

Municipality/County:

Potter Township, Beaver County, PA

This letter is intended to satisfy the requirements of Pennsylvania Acts 14, 67, 68, and 127 and the Pennsylvania Municipalities Planning Code. Section 1905-A of the Commonwealth Administrative Code as amended by Act 14, requires that each applicant for a PADEP permit must give written notice to the municipality(ies) and the county(ies) in which the permitted activity is located. The written notices shall be received by the municipality(ies) and county(ies) at least 30 days before the PADEP may issue or deny the permit.

Acts 67 and 68, which amended the Municipalities Planning Code to support sound land use practices and planning efforts, direct state agencies to consider comprehensive plans and zoning ordinances when reviewing applications for permitting of facilities or infrastructure, and specify that state agencies may rely upon comprehensive plans and zoning ordinances under certain conditions as described in Sections 619.2 and 1105 of the Municipalities Planning Code.

Enclosed are the completed General Information Form (GIF) for this project. PADEP invites you to review the attached information and comment on the land use aspects of this project; please be specific to PADEP when identifying any areas of conflict. If you wish to submit comments for PADEP to consider in a land use review of this project, you must respond within 30 days to the PADEP regional office listed below. If no land use comments are received by the end of the comment period, PADEP will assume that there are not substantive land use conflicts and proceed with the normal application review process.

Please submit any comments concerning this project within 30 days from the date of receipt of this letter to the PADEP, Southwest Regional Office, Bureau of Water Standards and Facility Regulation, 400 Waterfront Drive, Pittsburgh, PA 15222-4745.

For more information about the land use review process, please visit www.depweb.state.pa.us, (keyword: Land Use Reviews). For more information about this project, please contact me at 724.709.2411.

Sincerely,

Kimberly Kaal

Environmental Manager Shell Polymers PA

300 Frankfort Road

Ula pole

Monaca, Beaver County, Pennsylvania 15061

Enclosures:

Completed GIF



Dear Customer,

The following is the proof-of-delivery for tracking number: 774174235680

Delivery Information:

Status:

Delivered

Delivered To:

Signed for by:

Signature release on file

Delivery Location:

206 MOWRY RD

Service type:

FedEx Standard Overnight

Special Handling:

Deliver Weekday

MONACA, PA, 15061

Delivery date:

Nov 21, 2023 14:43

Shipping Information:

Tracking number:

774174235680

Ship Date:

Nov 20, 2023

Weight:

0.5 LB/0.23 KG

Recipient:

Rebecca Matsco, Potter Township 206 Mowry Road MONACA, PA, US, 15061 Shipper:

Cheryl Surdick, AECOM 707 Grant Street 5th Floor Pittsburgh, PA, US, 15219

Reference

60694528.04

Proof-of-delivery details appear below; however, no signature is available for this FedEx Express shipment because a signature was not required.

Section 4

Evidence of newspaper publication for 4 consecutive weeks



Bucks County Courier Times The Dally American | Beaver County Times Pocono Record | Burlington County Times PO Box 630531 Cincinnati, OH 45263-0531

PUBLIC NOTICE

Notice is hereby given that Shell Chemical Appalachia LLC at 300 Frankfort Road, Monaca, PA 15061, (Phone -724.709.2467) intends to make application to the Department of Environmental Protection (DEP) to amend the existing Water Quality Management Permit (WQM No. 0417201) in a manner which meets DEP requirements, from its facility located in Potter and Center Townships, Beaver County.

The application is to amend the existing WQM permit to add equipment to enhance removal of hydrocarbons in the

wastewater prior to treatment in the existing biorreater. This application is made under the provision of the Clean Streams Law, the Act of June 22, 1937, P.L. 1987, as amended. Persons

desiring additional information, or who wish to provide comment regarding the permit application should contact the Company as indicated above, or DEP at the following address: Southwest Regional Office, Clean Water

Environmental Program Manager, 400

15222-4745,

Pittsburgh, PA November 29, 2023.

Clean

Waterfront

9433869 11/3, 11/10, 11/17, 11/24/23

(Phone 412.442.4000)

PROOF OF PUBLICATION

Kimberly Kaal Kimberly Kaal Shell Oil Company

300 Frankfort RD Monaca PA 15061-2210

STATE OF PENNSYLVANIA, COUNTY OF BEAVER

The Beaver County Times, Ellwood City Ledger, a daily newspaper of general circulation, published and having its place of business at Aliquippa, Beaver County, PA; that attached hereto is a facsimile of the printed notice which is exactly as printed and published in said newspaper issue dated on:

11/03/2023, 11/10/2023, 11/17/2023, 11/24/2023

That said newspaper was regularly issued and circulated on those dates.

Sworn to and subscribed before on 11/24/2023

Legal Clerk

Notary, State of WI, County of Brown

My commision expires

Publication Cost:

\$910.08

Order No:

9433869

of Copies:

Customer No:

1192767

PO #:

THIS IS NOT AN INVOICE!

Please do not use this form for payment remittance.

MARIAH VERHAGEN Notary Public State of Wisconsin

Section 5

PADEP WQM Checklist, Forms and Modules

- WQM Application 3850-PM-BCW0400 b
- WQM Checklist 3850-PM-BCW0400 c
- Module 15 Industrial Wastewater Treatment Facility

Applicant Name: Shell Chemical

Permit Application



COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION BUREAU OF CLEAN WATER

APPLICATION FOR WATER QUALITY MANAGEMENT PERMIT

Before completing this form, read the step-by-step instructions	s provided in this application package.							
Related ID#s (If Known) DEP USE ONLY								
Client ID# 311950 APS ID# Site ID# 102360 Auth ID# Facility ID#	Date Received & General Notes							
APPLICANT IDENT	TIFIER							
Application Type: ☐ New ☐ Modification ☐ Renewal	Permit Number (if 417201 modification or renewal)							
Applicant Name: Shell Chemical Appalachia LLC□								
Current Mailing Address: 300 Frankfort Rd, Monaca, PA 15061								
Current Phone Number: (724) 7092467								
FACILITY TYPE (Check all appro	opriate boxes below)							
Treatment Plant Summary – Module 1 Sewer System – Module 2 Flow Equalization and Grit Chambers – Module 3 Screening and Settling – Module 4 Trickling Filters and Aeration – Module 5 Chemical Treatment – Module 6 Rapid Sand Filters – Module 7 Other Filters and Disinfection – Module 8 Aerobic Digestion Tanks – Module 9 Anaerobic Digestion – Module 10 Sludge Filters and Centrifuges – Module 11 Sludge Drying Beds – Module 12 Stream Encroachment and Crossings – Module 13 Spray Irrigation – Module 14 Industrial Wastewater Treatment Facility – Module 15 Small Flow Treatment Facility – Module 16 Sewer Extensions – Module 17 Manure Storage Facilities – Module 18 Supplementary Geology and Groundwater Information Impoundments – Module 20	– Module 19							
Sequencing Batch Reactor – Module 21								
I Pump Stations - Module 22								

3850-РМ-ВСW0400b 7/2016 Appalachia LLC Applicant Name: Shell Chemical

Permit Application

COMPLIANCE HISTORY REVIEW								
Is/was the facility owner or operator in violation of any DEP regulation, permit, order Yes No or schedule of compliance at this or any other facility?								
If "Yes," list each permit, order and schedule of compliance and provide compliance status. Use additional sheets to provide information on all permits.								
Permit Program See Attached Summary	Permit No.							
Brief Description of Noncompliance								
Steps Taken to Achieve Compliance	Date(s) Compliance Achieved							
Current Compliance Status	In Noncompliance							

COMPLIANCE HISTORY REVIEW SUMMARY

Date	Location	Plan Approval/ Operating Permit#	Nature of Documented Conduct	Type of Department Action	Status Litigation; Existing / Continuing; or corrected/Date	Dollar Amount Penalty
05/24/2023	Shell Polymers Monaca	PA-04- 00740A/B/C	Various NOVs and Exceedances of 12- Month Emission Limitations in 2022 and 2023	Consent Order and Agreement	Signed COA and implementing required terms and conditions	\$4,935,023 \$5,000,000: Projects to Benefit Community, Environment and Health
						\$521,549.62: Monthly emissions for May 2023
						\$1,046,766.94: Monthly emissions for June 2023
						\$844,373.39: Monthly emissions for July 2023
						\$250,791.20: Monthly emissions for August 2023
						\$0: Monthly emissions for September 2023
9/11/2023	Shell Polymers Monaca	PA-04-00740C	NOV for Benzene Waste NESHAP (BWON)	Notice of Violation	Pending settlement	TBD

Applicant Name: Shell Chemical

Permit Application

	CERTIFICATION (Check	appropriate box below.)	
I certify under penalty of law the	at I		
	this application (attach dele	gation of signatory authority) and that of the application are true and corre	
Kimberly	/ Kaal	Environmental Manager (A	attorney-in Fact)
Name (type or		Official Title	
Mix	Mill	#/16/2 Date	3
Şignat	ure	Date	
(Use corporate or profession appropriate.)	onal seal as		
Taken, sworn and subscribed	before me, this ////	day of November 20 3	3.
Commonwealth of Penn TERRI PIZOR-LEVENTH Notary 野砂倉 C My Commission Expires Commission Num	AL - Notary Public ounty	wedthal.	
	LICENSED PROFES	SIONAL ENGINEER	
drawings, specifications and o engineering quality, true and c	ther documents which are particular and is in conformance not, to the best of my knowled	ering information contained in the acc art of this application and that I have to with the requirements of the Departn dge, withhold information that is pertine	found it to be of good nent of Environmental
Name of Design Engineer:	Carl J. Marsano, P.E.		REGISTERED
Design Firm: Mailing Address:	Wood Engineering & Archit	ectural Services, P.C.	PROTIES SUSING AND THE
Telephone Number: E-mail Address:	Tucker, GA 30084 (207) 286 7608 carl.marsano@woodplc.cor	m Magand- ure of Professional Engineer	ENGINEER No. PE40645
NOTICE: It is an offense und DEP.	der Pennsylvania Criminal C	ode to affirm a false statement in do	cuments submitted to
for the adequacy of all aspe	ects of facility designs. The	e seal is affixed to design documents to application and supporting docume istency with good engineering practices.	ntation submitted for



COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION BUREAU OF CLEAN WATER

CHECKLIST FOR WATER QUALITY MANAGEMENT PERMIT

APPLICANT NAME Shell Chemical Appalachia LLC Check the following list to make sure that you have included all the required information. Place the column provided for all items completed and/or provided. Failure to provide all of the requer will delay the processing of the application. ENCLOSE THIS CHECKLIST WITH YOUR APPLICATION FORM. Check the following list to make sure that you have included all the required information. Place will delay the processing of the application. ENCLOSE THIS CHECKLIST WITH YOUR APPLICATION FORM. Check the following list to make sure that you have included all the required information. Place will be required information. Place the column provided in the required information provided in the required in the requi	
the column provided for all items completed and/or provided. Failure to provide all of the requer will delay the processing of the application. ENCLOSE THIS CHECKLIST WITH YOUR APPLICATION FORM. Check If Include	
Check If Include 1. General Information Form (GIF). 2. Appropriate application fee, with check payable to the Commonwealth of PA 3. Two (2) copies (original and 1 copy) of application, design module(s), and accompanying drawings and plans. a. Certification and proper signatures. b. Engineer's professional seal on each plan sheet. c. Design Engineer's Report with signature and seal on cover d. Properly notarized (original). e. Technical specifications with engineer's seal and signature on cover	a checkmark in sted information
2. Appropriate application fee, with check payable to the Commonwealth of PA 3. Two (2) copies (original and 1 copy) of application, design module(s), and accompanying drawings and plans. a. Certification and proper signatures. b. Engineer's professional seal on each plan sheet. c. Design Engineer's Report with signature and seal on cover d. Properly notarized (original).	Use
3. Two (2) copies (original and 1 copy) of application, design module(s), and accompanying drawings and plans. a. Certification and proper signatures. b. Engineer's professional seal on each plan sheet. c. Design Engineer's Report with signature and seal on cover d. Properly notarized (original). e. Technical specifications with engineer's seal and signature on cover	
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c. Design Engineer's Report with signature and seal on cover d. Properly notarized (original).	
d. Properly notarized (original). e. Technical specifications with engineer's seal and signature on cover	
e. Technical specifications with engineer's seal and signature on cover	
f. Additional copy for Delaware River Basin or Erie and Allegheny counties (if required)	
1,7 and a series and a series and a series (in required).	
4. Supplemental Information:	
a. General Layout Diagram (unless design plans provide this information).	
b. Sizes, Capacities and Dimensions Diagram (unless design plans provide this information).	
5. Design Modules.	
6. Topographic map with appropriate details.	
7. Act 14 Notification.	
8. Act 537 Approval (if required).	
9. Cultural Resources Notification	
10 Acts 67, 68 and 127 Notification (IW and Manure Storage Facilities only).	
11. Proof of Public Notification (IW and Manure Storage Facilities only)	
12. DRBC Notification (if required).	
13. Other (specify):	



COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION BUREAU OF CLEAN WATER

INDUSTRIAL WASTEWATER TREATMENT FACILITY MODULE 15

APPLIC	CANT NAME	Shell Chemical Appalachia LLC							
Note:	A copy of the Des	sign Engineer's Re	port must be attached to this module.						
SIC/NA	ICS CODES								
	SIC CODE	NAICS CODE	Corresponding SIC/NAICS Description						
1st		<u>32</u>	Manufacturering						
2nd		<u>22</u>	<u>Utilities</u>						
3rd									
4th									
GENE	RAL DESCRIPTION AND	NATURE OF BUSINES	SS						
Petroch	nemical Complex								
LIST O	F PERMITS (List all NP	DES and WQM permits	presently held for this facility.)						
NPDES	S Permit PA0002208								
Water	QualityPermit 417201								

Module 15

PHYSICAL TREATMENT PROCESSES						
Treatment Process	Code					
Ammonia Stripping	AS					
Dialysis	DIALY					
Diatomaceous Earth Filtration	DEF					
Electrodialysis	ELECT					
Evaporation	EVAP					
Flocculation	FLOCC					
Flotation	FLOT					
Foam Fractionation	FF					
Freezing	FREEZ					
Gas-Phase Separation (air stripping)	GPS					
Grinding	GRIND					
Flow Equalization	FE					
Eutectic Freezing	EUTEC					
Screening	SCRN					
Microstraining	MSTRN					
Grit Removal	GR					
Mixing	MIX					
Moving Bed Filters	MBF					
Intermittent Sand Filters	ISF					
Reverse Osmosis (Hyperfiltration)	RO					
Rapid Sand Filtration	RSF					
Sedimentation	SEDI					
Slow Sand Filtration	SSF					
Solvent Extraction	SE					
Sorption (not Carbon)	SORPT					
Distillation	DISTL					
Multimedia Filtration	MF					
Filtration	FILTR					

DISINFECTION						
Hypochlorite	НҮРО					
Chlorine Gas	CL					
Ozone	OZONE					
Ultraviolet	UV					

BIOLOGICAL TREATMENT PRO	OCESSES
Treatment Process	Code
Activated Sludge	ACTSL
Aerated Lagoons	AERLG
Anaerobic Treatment	ANAE
Nitrification – Denitrification	NIDI
Pre-Aeration	PA
Spray Irrigation/Land Application	SILA
Stabilization Ponds	SP
Rotating Biological Contactors	RBC
Post Aeration	POA
Holding or Detention Pond	HOLD
Treatment by Plain Aeration	PLAIN
Ridge & Furrow Irrigation	RFI
Sheet or Overland Flow Irrigation	SOFI
Surface/Subsurface Injection	SSSI
Sequence Batch Reactor	SBR
Artificial Wetlands	ARTWL
Imhoff Tank	IMHOF
Polishing Lagoons	POL
Biological Hydrolysis	BIOHY
Trickling Filtration	TF
BIOSOLID USE/DISPOS	AL
Incineration	INCIN
Land Application	LNDAP
Landfill	LNDFL

DISPOSAL	
Discharge to Surface Water	
Ocean Discharge through Outfall	OCEAN
Reuse/Recycle of Treated Outfall	RCYEF
Underground Injection	UI
Reuse or Sale of Wastewater or Raw Material for Other Processes	REUSE

PYRO

Pyrolysis

CHEMICAL TREATMENT ANI PROCESSES	OTHER
Treatment Process	Code
Carbon Adsorption	CA
Chemical Oxidation	СО
Chemical Precipitation	СР
Chemical Hydrolysis	СН
Coagulation	COAG
Dechlorination	DC
Electrochemical Treatment	ET
Ion Exchange	IE
Neutralization	NEUT
Oxidation	ОХ
Temperature Control	TEMP
Oil & Grease Removal, Including Skimming & Separators	OGREM
Reduction	RD
Odor Control	ОС

BIOSOLID TREATMENT PROCESSES								
Aerobic Digestion	AERON'							
Anaerobic Digestion	ANED							
Belt Filtration	BELT							
Centrifugation	CENT							
Conditioning (Chemical, Heat)	COND							
Chlorine Treatment	CHTR							
Composting	COMP							
Drying	DRY							
Elutriation	ELU							
Flotation Thickening	FLOT							
Freezing	FREEZ							
Gravity Thickening	GRAV							
Sludge Lagoons	SLAG							
Vacuum Filtration	VAC							
Vibration	VIB							
Wet Oxidation	WETOX							
Pressure Filtration	PRESS							

Module 15

						Code for Treatment Unit	FLOT					
			(ша)			(Check) Ti						
ш			D_			(Check) Existing						
1. SOURCE OF WASTE	2. OUTFALL NO.		□ Continuous □ Intermittent From (am) □ Batch		Batches/day Gallons/batch Gallons/day	MGD 0.57 MGD Unit (1)	EC-15					
	systems					Code for Treatment Unit	FLOT					
2 Pond	other treatment		(md)			(Check) Proposed	⋈					
STE ECU and A(-discharge is to	/astewater	٥	;		(Check) Existing						
1. SOURCE OF WASTE ECU and AC Pond	2. OUTFALL NO. NA -discharge is to other treatment systems	Process and general wastewater	Continuous Intermittent From (am) Batch		Batches/day Gallons/batch 1.58 Gallons/day	MGD 1.58 MGD Unit (1)	WEMCO 84					
Summary of Wastewater Source and	Summary of Wastewater Source and Treatment Unit Information		4. WASTE FLOW PATTERN	5. DAILY WASTE VOLUME	TOTAL	6. DESIGN FLOW AVERAGE MAXIMUM	General Sequence of Treatment	List)				

(1) If impoundments are proposed and the wastewater entering the impoundment meets the definition of Residual Waste at Title 25 Pa. Code Chapter 287, the design must be in accordance with Title 25 Pa. Code § 299.144.

Use Additional Sheets If Necessary

Applicant Name: Shell Chemical Appalachia LLC

3850-PM-BCW0400r 7/2016

Module 15

NAME OF LABORATORY/CONSULTANT	CONSULTANT											
ORATORY	<u> </u>	<u></u>	MAX.	30	2							
E OF LAB	Telephone No.: ()	NT FACIL Expected	MIN									
NAM		NEW TREATMENT FACILITY EFFLUENT (Expected)	24 HR. MAX.									
2	NPDES Permit application submitted within last 3 years for this outfall.	NEWT	MONTHLY									
From	NPDES Permit submitted within for this outfall.	F .	MAX.									
		EATMEN FLUENT	Ν̈́									
SAMPLING PERIOD:	8 □	EXISTING TREATMENT FACILITY EFFLUENT	24 HR. MAX.									
SAMPLIN	□ Yes	EXIS	MONTHLY AVERAGE									
o other		ENT	MAX.	160								
charge is to	OUTFALL NA -discharge is to other treatment systems SOURCE OF WASTE:		MIN.	30								
OUTFALL NA -dischar treatment systems SOURCE OF WASTE:		ENT FACIL	24 HR. MAX.									
		- TREATM	MONTHLY AVERAGE									
	TERISTICS	SATION * -	UNITS	mg/L	mg/L							
	WASTE CHARACTERISTICS	SAMPLING LOCATION * TREATMENT FACILITY INFLUENT	PARAMETER	O&G	VOC							

*Use Additional Sheets as Necessary

Comments/additional information:

Section 6

Design Engineers Report

SHELL POLYMERS MONACA (SPM)

ADDENDUM TO DESIGN ENGINEER'S REPORT (Prepared as part of the WQM Permit Amendment)

Preparer
Shell Chemical Appalachia LLC

Date of Preparation
November 2023



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I. GENERAL INFORMATION

This is an addendum to the original "Design Engineer's Report" for the existing Wastewater Treatment Plant (WWTP) under Water Quality Management (WQM) Permit Number 0417201. This addendum describes the new temporary equipment added to the existing WWTP to address off-spec wastewaters from Ethane Cracking Unit (ECU).

In the original Engineers Report (Section 1.5 - ECU Offspec Wastewater Management), the design premise based on preliminary engineering data was:

"ECU may on occasion produce off-spec wastewater that cannot be readily treated in the WWTP. During such infrequent events, the off-spec wastewater is stored in one of the two FEOR tanks and pumped at a controlled rate using Process Wastewater Bleed Pumps to the other FEOR tank where it comingles with stored wastewater."

During startup and initial operation of the ECU it was determined that the wastewater stream generated from the ECU had Oil and Grease (O&G) and Volatile Organic Compound (VOC) concentrations in excess of original estimates thus exceeding the design basis for the Biotreaters. The occurrence of these off-spec events did not allow the off-spec wastewater to have adequate residence time in the FEOR tank to separate the O&G before being routed to Biotreaters. Additionally, FEOR tanks equipped with internal floating roof did not allow stripping of the VOCs (and routing to the Spent Caustic Thermal Oxidizer, SCTO) from off-spec wastewater resulting in VOC emissions over the aeration basins.

New temporary equipment (hereafter referred to as "Flotation System") was installed (under a Temporary Discharge Authorization (TDA) approved by the Department) to remove the O&G and VOCs from the off-spec wastewater before routing to the Biotreaters. Gas flotation was chosen to address both dispersed O&G as well as VOCs in the influent wastewater stream. Gas flotation is a process by which dispersed hydrocarbon droplets are removed from water by attachment to rising gas bubbles. The oily froth which forms on the surface of the water is removed by skimming and overflowing to a collection trough. The oily froth with some lighter solids from the collection troughs is routed to Recovered Oil Tank (ROT). Treated effluent is routed to the Biotreaters. Nitrogen is used both as flotation

gas as well as sweep gas to remove VOCs (off gas from wastewater stream) from the vapor space of the Flotation Units. The vent stream (nitrogen sweep gas with VOCs) is routed to the SCTO for thermal destruction.

This addendum is being made to incorporate the temporary equipment into the existing WQM. However, at this point the petrochemical plant is not fully on-line (about 70%) and as with any new facility, evaluations/modifications are being conducted to try and optimize operations. Based on the fluid nature of the startup plant operations, it is Shell's intent to operate these systems to obtain data throughout the startup process and potential operational changes to obtain data to determine if these systems are to remain as permanent equipment or if there is a more efficient/effective design alternative. Once the evaluation process is complete, Shell will present this information to the Department to determine proper permitting steps for the final design.

II. DETAIL DESCRIPTION OF PROPOSED WASTEWATER TREATMENT PROCESS

A. Basis of Design for Individual Treatment Unit

Block flow diagram and equipment P&IDs included in Section IV illustrates the Flotation System equipment to address off-spec wastewater from Ethylene Cracker Unit (ECU). The Flotation System has the capacity to handle peak wet weather conditions and any incidental flows form upstream process units as units are coming online. Two flotation system, the WEMCO 84 and EC-15, will operate parallel with feed from existing Flow Equalization and Oil Removal (FEOR) Tanks.

Table II-1: Expected Influent and Effluent Composition

Parameter	Feed	WEMCO-84 Outlet	EC-15 Outlet			
	990 - 1,100	705 - 1,100	396			
Flow capacity (gpm)*	(225 - 250 m3/h)	(160 - 250 m3/h)	(90 m3/h)			
O&G (mg/L)**	5 - 160	< 30	< 30			
VOCs (mg/L)***	0 - 15	< 2	< 2			

^{*}WEMCO-84 flow assumes partial flow with EC-15 parallel operation as well as full flow without EC-15 operating

New temporary equipment sizing basis and sparing philosophy:

■ WEMCO 84

WEMCO-84 is a mechanically induced gas flotation unit with four active cells that use nitrogen (N_2) as floatation gas because of presence of VOCs in the influent wastewater stream. A motor is mounted on the top of each active cell, which rotates a shaft, inside the standpipe, with a rotor at the bottom of the shaft. Rotating rotor creates a vortex inside of the standpipe which draws gas into the water. The water/gas mixture is expelled through the disperser that helps to create small bubbles. The disperser hood helps to suppress wave motion from the action of the rotor. The gas bubbles flow

^{**}O&G feed concentration is based on the historical data from plant startup. Effluent O&G concentration is estimated based on maximum levels for Biotreater operation.

^{***}VOC feed concentration is based on the historical data from plant startup. Effluent VOC concentration is model predicted with > 95% removal rate in Flotation Units.

upward, colliding with oil drops and carrying them to the surface. Skimmer paddles skim the oil/froth/foam off the surface, over an overflow lip into a launder or collection trough. The overflow lip known as a spillover weir allows treated effluent to flow to final clean cell where from treated effluent is pumped to Biotreaters.

Wastewater stream from existing Flow Equalization and Oil Removal (FEOR) Tanks (T-59707A/B) is routed to the WEMCO 84 (V-59781), using existing Biotreater Feed Pumps (P-59704A/B), to remove the oil and grease (O&G) and strip off volatile organic compounds (VOCs). Effluent Pumps (P-59785A/B) transfer treated effluent from V-59781 to the existing Biotreaters (T-59709A/B) for further removal of dissolved contaminants i.e., biological oxygen demand (BOD) and chemical oxygen demand (COD). Oil Recovery Pump (P-59784) transfers O&G, froth and solids separated in V-59781 to existing Recovered Oil Tank (T-59708) for further treatment. Vent gas, containing stripped off VOCs, from V-59781 is connected to the suction line of the existing Wastewater Tanks Vent Blower (K-59705) and routed to existing SCTO (A-53501) for thermal destruction.

Table II-2: WEMCO-84 Specifications

Flotation Unit	
Size	31'-6" L x 8'-0" W x 12'-4" H
Capacity	1,125 gpm (256 m3/h)
Design Pressure and Temperature	1 psig at 140°F
Operating Pressure and Temperature	0.25 psig at 80°F
Oil Removal Efficiency*	70 - 90% (> 6 µm droplets)
	~50% (< 50 mg/L inlet O&G)
	80 - 90% (> 100 mg/L inlet O&G)
Depurators	
Number of depurators	4
Motor /RPM	15 HP (each) / 1,800 rpm
Oil Recovery Pump (air operated diaphragm)	
Capacity	100 gpm (23 m3/h)
Pressure	42 psig
Air Supply	60 scfm at 65 psig
Effluent (Discharge) Pumps	

Capacity	1,200 gpm (273 m3/h)
Pressure	52 psig
Motor/RPM	50 HP / 1,800 rpm

^{*}Based on WEMCO operational data from other Shell facility.

■ EC-15

EC-15 is a hydraulically induced gas flotation with four active cells unit using nitrogen (N_2) as floatation gas because of presence of VOCs in the influent wastewater stream. The operation of a hydraulically induced gas flotation unit is similar to the mechanically induced gas flotation unit except instead of using a mechanically driven impeller to generate bubbles, a recirculated stream of clean water is mixed with gas and the mixture is injected into the flotation unit. Each cell is separated by two steel plates which are referred to as weirs. The final chamber is the clean cell. Level is controlled in the clean cell at the outlet of the EC-15. Since all the cells are connected hydraulically, this level controls the level in all the cells. Gas is pulled from the common vapor space into a device called an eductor. The eductor is mounted in a pipe that carries water from the final chamber or "clean cell". Each chamber has a water pipe with two eductors. The water used in the eductor is recirculated from the clean water effluent or discharge. A pump is used to provide the motive force for this water recirculation. The amount of gas that is added to the water depends on the eductor venturi diameter, the inlet gas pressure, and the water flow rate.

Wastewater stream from existing FEOR Tanks (T-59707A/B) is routed to the EC-15 (V-59791), using existing Biotreater Feed Pumps (P-59704A/B), to remove the oil and grease (O&G) and strip off volatile organic compounds (VOCs). Effluent Pumps (P-59795A/B) transfer treated effluent from V-59791 to the existing Biotreaters (T-59709A/B) for further removal of dissolved contaminants i.e., biological oxygen demand (BOD) and chemical oxygen demand (COD). Oil Recovery Pump (P-59794) transfers O&G, froth and solids separated in V-59791 to existing Recovered Oil Tank (T-59708) for further treatment. Vent, containing stripped off VOCs, from V-59791 is connected to the existing Wastewater Tanks Vent Blower (K-59705) and routed to existing SCTO (A-53501) for thermal destruction.

Table II-3: EC-15 Specifications

Table 11-3, EC-13-3	pecifications		
Flotation Unit	4		
Size	24'-0" L x 5'-6" ID		
Capacity	438 gpm (99 m3/h)		
Design Pressure and Temperature	1 psig at 200°F		
Operating Pressure and Temperature	0.25 psig at 140°F		
Oil Removal Efficiency	90 - 97% (Vendor data)		
Eductors			
Number of eductors	4 (dual eductors)		
Capacity	25 gpm (6 m3/h)		
Recycle Pumps			
Capacity	219 gpm (50 m3/h)		
Pressure	60 psig		
Motor/RPM	15 HP / 3,600 rpm		
Oil Recovery Pump (air operated diaphragm)			
Capacity	40 gpm (9 m3/h)		
Pressure	52 psig		
Air Supply	30 scfm at 56 psig		
Effluent (Discharge) Pumps			
Capacity	500 gpm (114 m3/h)		
Pressure	65 psig		
Motor/RPM	30 HP / 3,600 rpm		

B. Supplemental Chemical Addition or Treatment

Chemical additives can be used to enhance O&G and solids removal in the Flotation System. Nitrogen is used as a sweep gas to help remove VOCs (stripped off from wastewater) from the vapor space in the Flotation Units.

O&G and Solids Removal Aid

Provisions are made to add coagulant (NALCO 8140) and flocculant (NALCO 71306), as needed, to the feed to Flotation Units to enhance O&G and solids removal. Based on current conditions, it is premised there will not be any need for addition of these chemicals on continuous basis.

VOC Stripping Gas

Nitrogen is used as flotation gas in both WEMCO-84 and EC-15. Nitrogen is also used as sweep gas for removing the stripped VOCs from wastewater in the Flotation Units.

C. Pumping Equipment

Pumps and Blowers servicing the Flotation System are listed below.

Table II-4: Pump and Blower Specifications

Name	Service	Sparing	Capacity	Controls
Biotreater Feed	WW from FEOR	2x100%	823 gpm	Flotation
Pumps (Existing)	tanks to Flotation		(187 m3/h)	System flow
	Units			and level
				control
Oil Recovery Pump	O&G/Float from	1x100%	100 gpm	WEMCO-84
	WEMCO-84 to		(23 m3/h)	oil trough level
	Recovered Oil Tank			switch (local)
Effluent Pump	Treated effluent from	2x100%	1,200 gpm	WEMCO-84
	WEMCO-84 to		(273 m3/h)	level control
	Biotreaters			
Oil Recovery Pump	O&G/Float from EC-	1x100%	40 gpm	EC-15 oil
	15 to Recovered Oil		(9 m3/hr)	trough level
	Tank			switch (local)
Recycle Pump	Treated effluent from	2x100%	219 gpm	EC-15 level
	EC-15 to Eductors		(50 m3/hr)	control
Effluent Pump	Treated effluent from	2x100%	500 gpm	EC-15 level
	EC-15 to Biotreaters		114 m3/h)	control
Wastewater Tank	Vent from Flotation	1x100%	480 scfm	Flotation Units'
Vent Blower (Existing)	Units to SCTO		(770	Pressure
			Nm3/h)	Control

D. Monitoring and Control Equipment

Following objectives/provisions are implemented to control the Flotation System and ensure successful operation to meet the treatment goals.

- Objective A1: To control influent flow from FEOR Tanks to the Flotation Units.
 - WEMCO-84: has no direct flow control because capacity of unit is higher than the capacity of Biotreater Feed Pumps (P-59704A/B), however indirectly flow is controlled via level control loop (597LCV-018). Inlet flow is monitored using 597FIT-835.
 - EC-15: Flow control is achieved by monitoring the wastewater flow (597FIT-935) in the inlet line that modulates the inlet valve (597FCV-935) to maintain requisite flow to EC-15.
- Objective A2: To protect Flotation Unit(s) from overflowing.
 - WEMCO-84: Overflow protection is achieved by monitoring the liquid level (597LIT-018) in the outlet chamber which modulates the inlet valve (597LCV-018), and interlocks Biotreater Feed Pumps (P-59704A/B) and Vent Blower (K-59705) to stop when liquid level reaches High-High threshold. The operator will manually restart the Biotreater Feed pump to feed WEMCO-84 when level reaches normal operating range.
 - EC-15: Overflow protection is achieved by monitoring the liquid level (597LIT-919) in the outlet chamber which modulates the outlet valve (597LCV-919). Redundant level instrument (597LIT-918) interlocks Vent Blower (K-59705) to stop when liquid level reaches High-High threshold.
- Objective A3: To remove separated O&G from Flotation Unit(s) and transfer to Recovered Oil Tank.
 - WEMCO-84: Removal of separated O&G is achieved by measuring level in Oil
 Trough (597-LSH-864) and starting the Oil Recovery Pumps (P-59784) when oil
 trough level reaches High threshold and stopping the pump when level reaches Low
 threshold.
 - EC-15: Removal of separated O&G is achieved by measuring level in Oil Trough (597-LSH-964) and starting the Oil Recovery Pumps (P-59794) when oil trough level reaches High threshold and stopping the pump when level reaches Low threshold.
- Objective A4: To remove off-gas vapors from Flotation Units and send it to SCTO.
 - WEMCO-84: Venting off vapors is achieved by measuring pressure in the vapor space (597PIT-872) and starting the existing Vent Blower (K-59705) when the

pressure reaches High threshold and stopping when pressure reaches Low threshold. The blower is interlocked to stop when the pressure reaches Low-Low threshold.

 EC-15: Venting off vapors is achieved by measuring pressure in the vapor space (597PIT-972) and starting the existing Vent Blower (K-59705) when the pressure reaches High threshold and stopping when pressure reaches Low threshold. The blower is interlocked to stop when the pressure reaches Low-Low threshold.

E. Handling, Conditioning and Storage of Residual Materials

The residual materials generated from Flotation Units is the floated O&G, settled solids, and stripped off VOCs.

Recovered (floated) O&G:

The floated (separated) O&G is collected in oil troughs within the Flotation Units. Collected O&G with some lighter suspended solids are transferred to existing Recovered Oil Tank for further separation of entrained water. Separated water is periodically pumped back to the FEOR tanks. The separated oil will be pumped out periodically and sent off-site for disposal/reuse.

Settled Solids:

Any settled solids in the Flotation Units are also pumped to the Recovered Oil Tank for further separation of entrained water. Separated water is periodically pumped back to the FEOR tanks. The settled solids will be periodically pumped out and sent off-site for disposal.

Stripped off VOCs:

Stripped off VOCs from wastewater streams are swept with nitrogen gas and the vent is routed to the existing SCTO for thermal destruction.

III. OPERATIONAL FLEXIBILITY AND RELIABILITY OF TREATMENT SYSTEM

A. Alarms and Sensing Devices

Process controls, with sensing devices and alarms, used to monitor Flotation Units' operation are discussed in this section. Each monitored parameter is provided with alarms in Distributed Control System (DCS) in case the variable falls outside its normal operating range.

- Flotation Unit Flow Control
 - WEMCO-84
 - 597FIT-835 H
 - 597FIT-835 L
 - EC-15
- 597FIT-935 H
- 597FIT-935 L
- Flotation Unit Level Control
 - WEMCO-84
 - 597LIT-018 H
 - 597LIT-018 L
 - EC-15
- 597LIT-918 H
- 597LIT-918 L
- Flotation Unit Pressure Control
 - WEMCO-84
 - 597PIT-872 H
 - 597PIT-872 L
 - EC-15
- 597PIT-972 H
- 597PIT-972 L

Table III-1: Summary of Sensing Devices

- WEMCO-84 Level Control (597LC-018)
- WEMCO-84 Oil Trough Level Switch (597LSH-864) Local

- WEMCO-84 Flow Transmitter (597FT-835)
- WEMCO-84 Pressure Control (597PT-872)
- WEMCO-84 Nitrogen (sweep) Pressure Indicator (597PI-876) Local
- EC-15 Level Transmitter (597LT-918)
- EC-15 Level Control (597LC-919)
- EC-15 Oil Trough Level Transmitter (597LSH-964) Local
- EC-15 Flow Control (597-FC-935)
- EC-15 Pressure Control (597-PT-972)
- EC-15 Nitrogen (sweep) Pressure Indicator (597PI-976) Local
- B. Control, and Quantity and Quality of Wastewater when Treatment System is Inoperative

The performance of the Flotation Units can be affected by power loss, mechanical failure, and/or process upsets. Flotation Units are fed from the FEOR tanks each with working capacity of 660,400 gal (2500 m3) which is adequate to temporarily store wastewater for 20 - 30 hours. Provisions are made to isolate and use one FEOR tank to temporarily store off-spec wastewater and pump it at a controlled rate to the other FORT tank. The bleed pumps are 100% spared allowing maintenance of one pump. FEOR tanks' oil removal pumps are also spared. Pumps that return separated water from Recovered Oil Tank to FEOR Tanks are similarly spared.

The Flotation Units and associated pumps are installed in an area which drains to AC collection system to provide secondary containment in case of equipment failure. From the FEOR tanks wastewater is pumped to the Flotation Units using spared pumps. Effluent from Flotation Units is routed to redundant Biotreater Plants via redundant effluent pumps. All continuously operating pumps associated with Flotation Units are provided with installed spare that the Operator can put in service if the loss of service (lead) equipment is alarmed in the DCS.

Power failure lasting several hours is not expected to irreversibly impair the operation of the Flotation Units and wastewater can be stored in FEOR tanks temporarily.

Mechanical failure or Loss of power to existing vent blowers used to rout vent gases from Flotation Units to the SCTO can temporarily halt the operation of Flotation Units. However, upon power restoration these systems are expected to restore normal treatment efficiency.

C. Personal Training

This section briefly summarizes the training of personnel responsible for the operation, maintenance, and performance of Flotation Units. These Flotation Units will be operated from the Centralized Control Building (CCB) for the control and performance monitoring. Ensure Safe Production (ESP) program will be implemented to enable operators and support staff to clearly understand and operate the Flotation Units within their operational limits.

Along with WWTP operation, Flotation Units will be staffed 24 hours, 7 days a week covering periods of adverse weather conditions. Operation shall include all plant equipment, valves, sampling, and lab analyses.

Personnel training will include taking representative samples for laboratory analyses including preservation requirements. Personnel training also will include how to generate various "Reports" of all major and minor components for review and records including creating, maintaining, and dispositioning of reports that are specifically required for NPDES permit compliance, daily operating logs of plant including establishing process control set points. Importance of reporting equipment deficiencies promptly will be emphasized. Corrective maintenance in an emergency that is required to return the system or component to proper operating condition will be discussed.

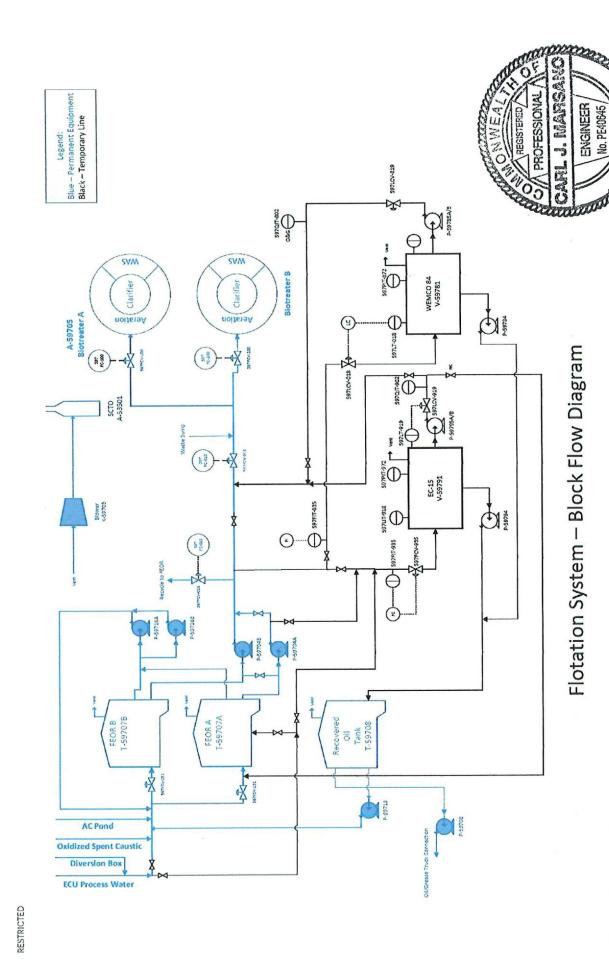
All employees responsible for plant operation will possess a current appropriate Flotation Unit operation training for their assigned work duties. Management is responsible for maintaining a list of all employees including their current training status.

D. Availability of Instructions and Guidelines for the Operation and Maintenance of Treatment Units

Operations and Maintenance (O&M) manual covering the operation of WEMCO-84 and EC-15 will be available to operators. The manual includes details on receiving, installation, startup, and run and maintain of Flotations Units and associated equipment.

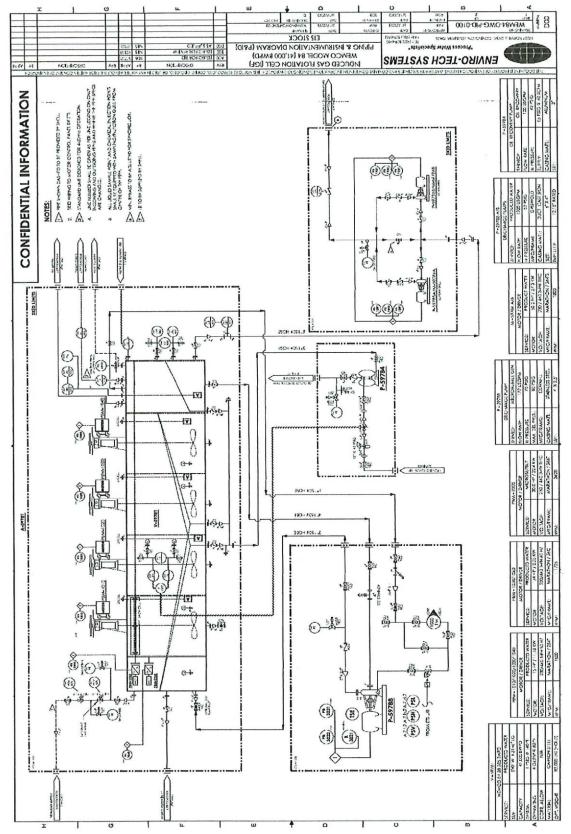
IV. APPENDICES CONTAINING SUPPORTING INFORMATION

A. Block Flow Diagram showing Flotation System



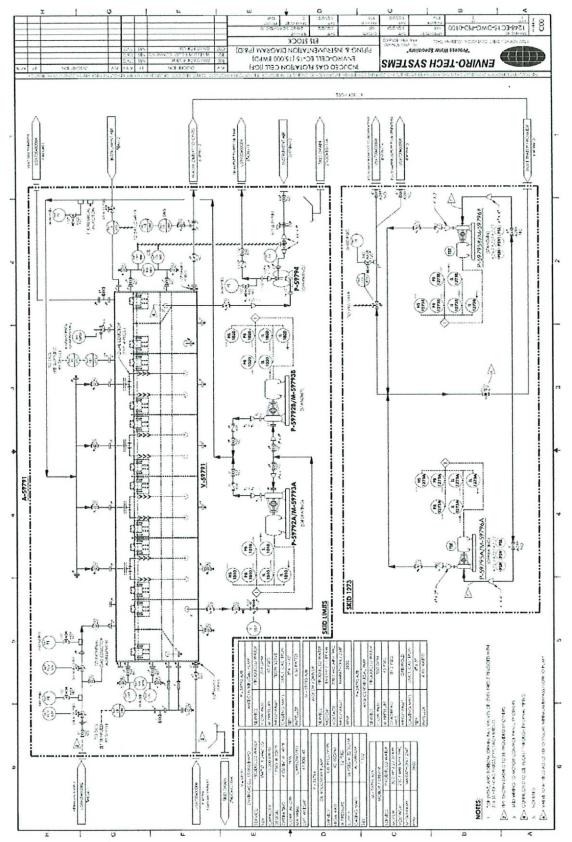
Addendum to Design Engineer's Report

B. WEMCO-84 Equipment P&ID



Addendum to Design Engineer's Report

C. EC-15 Equipment P&ID



Addendum to Design Engineer's Report