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April 7, 2026  
Remarks for Public Comment  
Pa. Dept. of Environmental Protection (DEP)

My name is Debra Smit, and I am speaking on behalf of the Breathe Project in Southwest Pennsylvania, where I serve as Director of Communications.

We all deserve to live in a community where the air we breathe, water we drink and place we call home do not increase the risks of cancer, heart disease, asthma, respiratory illnesses or lifelong harm from air pollution.

In December 2016, I attended the DEP hearing on Shell's proposed petrochemical plant. At that time, more than 100 residents stood here and raised serious concerns about allowing Shell to further pollute their air and contaminate their water.

Nearly ten years later, we are here again. These concerns have not only persisted. They have intensified.

First, Shell has repeatedly operated in violation of the Clean Air Act. During the commissioning period, emissions exceeded permitted limits, including nitrogen oxide and hazardous air pollutants. Most concerning is benzene—a known human carcinogen—for which there is no safe level of exposure. Shell's permit allows 11 tons per year, yet reported emissions have reached as high as 60 tons annually. DEP must require compliance with the originally permitted limits.

Second, the pattern of **Notices of Violation and malfunction reports** demonstrates systemic operational failures—not isolated incidents. These include flaring events, equipment breakdowns and uncontrolled releases. Continuous, real-time fence-line monitoring that includes a hazardous air pollutants must be required to protect nearby communities.

Third, Shell keeps **moving the goalposts on permits**, seeking to increase allowable emissions after failing to meet existing limits. The plan approval permits were meant to be temporary, 1-year allowances to get the plant operating. Instead they have been used over 5 years after the plant started operating. The DEP has the authority—and the

obligation—to require the cessation of unlawful operations and demand enforceable, transparent limits in an operating permit.

Fourth, proposed increases in emissions—including nitrogen oxides and carbon dioxide, greenhouse gases, from 2.3 to 2.6 million tons annually—must be denied. These increases would worsen climate impacts.

Fifth, DEP should deny the use of **pyrolysis oil as a feedstock**, due to increased risk of toxic emissions.

Sixth, flaring must be addressed as a major source of pollution. While flares are designed to destroy hazardous compounds, when they malfunction, they release fine particulate matter and toxic pollutants including benzene, formaldehyde and heavy metals.

The question is simple: Why should DEP accommodate a company that has not demonstrated the ability—or willingness—to comply with existing air pollution permit limits?

What does the community get? Based on economic study (by the Institute for Energy Economics and Financial Analysis), revenue for Shell's chemical business has fallen sharply, the outlook for the plastics industry is bleak and Shell Polymers is looking to sell the Monaca Plastic Plant. It's very unclear what the future would hold if Shell does sell off to another company. The Clean Air Act, however, is clear. Limits must be met—not renegotiated after the fact. For these reasons, Breathe Project is requesting the DEP **deny this draft Plan Approval D and rein in Shell Polymers to follow the law.**