

## California Environmental Quality Act (CEQA)

## NOTICE OF EXEMPTION

**TO: Contra Costa County  
Clerk Recorder's Office  
555 Escobar Street  
Martinez, CA 94553**

**FROM: Bay Area Air Quality Management District  
375 Beale Street, Suite 600  
San Francisco, CA 94105**

**SUBJECT: FILING OF NOTICE OF EXEMPTION PURSUANT TO SECTION 21152 OF THE PUBLIC RESOURCES CODE AND CEQA GUIDELINES SECTION 15062.**

**Project Title: SHELL CHEMICAL LP – Issuance of an Authority to Construct and Permit to Operate for the Installation of Two Catalyst Impregnation Vessels (Air District Application 31567).**

**Public Agency Approving Project:** Bay Area Air Quality Management District (Air District), 375 Beale Street, Suite 600, San Francisco, CA 94105. Attn: Samuel Dennis, Air Quality Engineer, Telephone: (415) 749-4689. Email: sdennis@baaqmd.gov.

**Project Applicant and Entity Carrying Out Project:** Shell Chemical LP (Shell).

**Project Applicant Address:** 2840 Willow Pass Road, Bay Point, CA 94565.

**Project Applicant Contact Person:** Jeff Luengo, PIMZ Environmental Manager, Shell Catalysts & Technologies, Telephone: (952) 313-9862; Email: jeff.luengo@shell.com.

**Project Location:** 10 Mococo Road, Martinez, Contra Costa County, CA 94553. Nearest Cross Street: across from Bridgehead Road.

**Project Description:** This permit action is to issue an Authority to Construct for the installation of the following new equipment:

**Source 6008 Ethylene Oxide Catalyst Impregnation Vessel #1 for A-Train  
Material Handling, 700 gallons, abated by pulse-jet baghouse A-616**

**Source 6009 Ethylene Oxide Catalyst Impregnation Vessel #2 for A-Train  
Material Handling, 700 gallons, abated by pulse-jet baghouse A-616**

and for Alteration of the following existing equipment:

**Source 6025 A-Train Catalyst Dryer**

**Source 6026 A-Train Catalyst Conveyor System**

**Source 6027 Ethylene Oxide Catalyst Packing Station for A-Train**

Sources 6008 and 6009, Ethylene Oxide Catalyst Impregnation Vessels #1 and #2 for A-Train, will replace Source 6001, an existing 500-gallon capacity Ethylene Oxide Catalyst Impregnation Vessel, located on the A-Train manufacturing line. This project will allow the A-train catalyst manufacturing line to operate continuously by alternating between the new vessels and operate more efficiently (higher uptime) since either Source 6008 or 6009 can be operated while the other is being loaded. In contrast, the current

operation with just Source 6001 limits Shell to operate the A-train catalyst manufacturing line as a batch process. The Air District will lower the existing "dry materials" catalyst permitted throughput limit from 9,125 tons per year to 7,884 tons per year in permit condition 26292 for Sources 6008, 6009, 6025, 6026, and 6027 to ensure this project does not debottleneck the A-train catalyst manufacturing line and lead to an expansion of use.

**Finding of Exemption:**

The Air District has determined that the issuance of this Authority to Construct is categorically exempt from CEQA because the project involves no expansion of use beyond that previously existing at the time of the Air District's CEQA determination. (CEQA Guidelines § 15301). The Authority to Construct is also categorically exempt from CEQA because the project involves replacement of existing equipment with equipment that will have substantially the same purpose, location, and capacity. (CEQA Guidelines § 15302). Lastly, this project is exempt because the evaluation of this proposed project confirms that there is no possibility of any significant effect on the environment from the project (CEQA § 21084(a); CEQA Guidelines § 15061(b)(3), known as the "common sense" exemption).

**Basis for Exemption:**

The project is exempt under CEQA Guidelines § 15301 because the lowered permit condition throughput limit of "dry materials" will ensure that the A-train catalyst manufacturing line's capacity is not increased. Therefore, there is no expansion of use. The project is also exempt under CEQA Guidelines § 15302 because the new equipment will have substantially the same location, capacity, and will be used for the same purpose as the replaced unit. As required under Air District Regulation 2-1-426.1, a completed Form Appendix H has been submitted by the applicant that demonstrates that the project has no potential for causing any significant environmental impacts. Therefore, approval of the project also qualifies for the "common sense" exemption because there is clearly no possibility the project will have a significant effect on the environment.



Pamela J. Leong  
Director of Engineering  
Bay Area Air Quality Management District

March 11, 2024  
Date