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February 14, 2023

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**MICHIGAN AIR RULE 336.1912 RELEASE NOTIFICATION / VIOLATION NOTICE FOLLOW-UP  
FROM CORTEVA AGRISCIENCE LLC, MICHIGAN OPERATIONS SRN#P1028**

As requested per the Violation Notice received on 1/27/2023, Corteva Agriscience LLC (Corteva) is providing an update to the root cause finding and additional corrective actions to the Rule 912 notification for the 12/21/2022 event that occurred at EU1200 1200 building.

On December 21, 2022, EU1200 had an unplanned event where both TTUs went offline unexpectedly. At the time of the formal notification on December 30, 2022, the preliminary root cause was felt to be an issue with the gas-to-air ratio valve on TTU-1870 which led to the unexpected shutdown of TTU-1870. It was also thought that the shutdown of TTU-1870 created a pressure surge in the vent header system which forced TTU-1875 to go offline and stop taking process vents.

Since the December 30th notification, the plant was able to conduct a more thorough investigation (with involvement from the TTU supplier technical support) to determine the initiating events which forced both TTU's offline simultaneously. TTU-1870 did have a problem with the gas-to-air ratio valve, but this is not what caused the unit to shut down. Shortly before the event, both fresh air damper valves were partially open to maintain the desired vent header pressure per the setpoint in the control system. The control system then wanted both fresh air damper valves to close. The valves closed but the proximity switches did not register that the valves closed, which caused the alarm 'Fresh air damper failed to close' to come true on both units. The control logic was set up such that this alarm automatically closed the process vent inlet damper valve to each TTU. With both damper valves closed, the vent header pressured up and forced the vent gas to be emitted out the relief valves of the upstream vent header knock out pot. The facility is not aware of a definite cause for the proximity switch issue.

The supplier provided PLC (programmable logic controller) programming executed an automated alarm response that the plant does not agree with. Corteva does not support that the process damper valve should close if the fresh air damper valve fails to fully close. The control logic has been revised so that this specific alarm will no longer shut down the unit. Also, a full review of the PLC programming and "offline" automated responses is scheduled to be conducted the week of February 20 with Corteva Operations and Programming experts along with the TTU Supplier technical team to review, modify, and update the automated response strategy of both units to improve online reliability and minimize risk of untreated vents being released to the atmosphere.

If you have any questions regarding this event, please contact Patty Worden at 989-898-5129 or at [patricia.worden@corteva.com](mailto:patricia.worden@corteva.com).

As a Responsible Official, I certify that, based on information and belief formed after reasonable inquiry, the statements and information in this submittal are true, accurate, and complete.

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