



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF
ENVIRONMENT, GREAT LAKES, AND ENERGY
BAY CITY DISTRICT OFFICE



LIESL EICHLER CLARK
DIRECTOR

August 5, 2021

Lisa Callender
Corteva AgriScience LLC
305 North Huron Avenue
Harbor Beach, Michigan 48411

SRN: B4942, Huron County

Dear Ms. Callender:

VIOLATION NOTICE

On March 3 - 4, 2021, and April 12 - 16, 2021, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), observed stack testing at Corteva AgriScience LLC located at 305 North Huron Avenue, Harbor Beach, Michigan. The purpose of these stack testing events was to determine Corteva AgriScience LLC's compliance with the requirements of the federal Clean Air Act; Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451); the Air Pollution Control Rules; and the conditions of Renewable Operating Permit (ROP) number MI-ROP-B4942-2020a.

During the stack testing and follow up review of reports received, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
EUPROCESS	ROP No. MI-ROP-B4942-2020a, EUPROCESS, Special Conditions (SC) I.1, I.3, I.4; 40 CFR Part 63, Subpart MMM	Organic HAP emission limit exceedance
EUPROCESS	ROP No. MI-ROP-B4942-2020a, EUPROCESS, SC I.6	VOC emission limit exceedance
EUPROCESS	ROP No. MI-ROP-B4942-2020a, SC IV.3(a)(i); Rule 910; 40 CFR Part 63, Subpart MMM	Unsatisfactory operation of a control device to limit HAP emissions
EUPROCESS	ROP No. MI-ROP-B4942-2020a, EUPROCESS, SC IV.3(a)(iv)	Deviations from the permitted hourly average combustion air to natural gas ratio range

EUPROCESS	Rule 201	Additional formaldehyde emissions not included during previous permitting
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During the April 12-16, 2021 stack test, the results showed that the combined emission concentrations of methanol and formaldehyde for TTU 850, TTU 860, and TTU 865 exceeded the Organic HAP emission limit of 20 ppmv. This is a violation of MI-ROP-B4942-2020a, EUPROCESS, SC I.1, I.3, and I.4. Additionally, this is a violation of the National Emissions Standards of Hazardous Air Pollutants (NESHAP) for Pesticide Active Ingredient Production, 40 CFR Part 63, Subpart MMM.

During the April 12-16, 2021 stack test, the combined lb/hr formaldehyde and methanol emission concentrations exceeded the 10.4 lb/hr VOC emission limit for TTU 860. This is a violation of MI-ROP-B4942-2020a, EUPROCESS, SC I. 6.

During the April 12-16, 2021 stack test, the results showed the combined emission concentrations of methanol and formaldehyde for TTU 850, TTU 860 and TTU 865 exceeded the Organic HAP emission limit of 20 ppmv. Based on the results, the control devices for EUPROCESS are not working in a satisfactory manner and this is a violation of MI-ROP-B4942-2020a, EUPROCESS, SC IV.3(a)(i). Additionally, this is a violation of Rule 910 and the NESHAP for Pesticide Active Ingredient Production, 40 CFR Part 63, Subpart MMM.

Since the issuance of Permit to Install (PTI) No. 107-18B on March 31, 2020, which has since then been rolled into MI-ROP-B4942-2020a, the facility has reported approximately 756.75 hours of deviations of missing air to natural gas data and air to natural gas ratio excursions from the permitted air to natural gas ratio range of 9 to 1 to 11 to 1. This is a violation of MI-ROP-B4942-2020a, EUPROCESS, SC IV.3(a)(iv).

During the March 3-4, 2021 and April 12-16, 2021 stack testing, formaldehyde emissions were identified that were not included in previous permitting. The additional formaldehyde emissions are a Rule 201 violation.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by August 26, 2021 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violations occurred; an explanation of the causes and duration of the violations; whether the violations are ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violations and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

Please submit the written response to EGLE, AQD, Bay City District, at 401 Ketchum Street, Suite B, Bay City, Michigan 48708 and submit a copy to Ms. Jenine Camilleri,

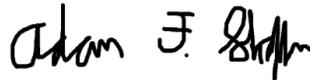
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Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan
48909-7760.

If Corteva AgriScience LLC believes the above observations or statements are inaccurate or do not constitute violations of the applicable legal requirements cited, please provide appropriate factual information to explain your position.

Thank you for your attention to resolving the violations cited above and for the cooperation that was extended to me during my observations of the stack testing completed by Corteva AgriScience LLC. If you have any questions regarding the violations or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



Adam Shaffer
Environmental Quality Analyst
Air Quality Division
989-225-4789

cc: Ms. Mary Ann Dolehanty, EGLE
Dr. Eduardo Olaguer, EGLE
Ms. Jenine Camilleri, EGLE
Mr. Christopher Ethridge, EGLE
Mr. Chris Hare, EGLE
Mr. Jim McGee, Corteva AgriScience LLC