

**MICHIGAN DEPARTMENT OF ENVIRONMENT, GREAT LAKES, AND ENERGY  
AIR QUALITY DIVISION**

FEBRUARY 5, 2021

**PERMIT TO INSTALL**  
147-20

**ISSUED TO**  
CORTEVA AGRISCIENCE, LLC

**LOCATED AT**  
701 WASHINGTON STREET  
959 BUILDING  
MIDLAND, MICHIGAN 48667

**IN THE COUNTY OF**  
MIDLAND

**STATE REGISTRATION NUMBER**  
P1028

The Air Quality Division has approved this Permit to Install, pursuant to the delegation of authority from the Michigan Department of Environment, Great Lakes, and Energy. This permit is hereby issued in accordance with and subject to Section 5505(1) of Article II, Chapter I, Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended. Pursuant to Air Pollution Control Rule 336.1201(1), this permit constitutes the permittee's authority to install the identified emission unit(s) in accordance with all administrative rules of the Department and the attached conditions. Operation of the emission unit(s) identified in this Permit to Install is allowed pursuant to Rule 336.1201(6).

DATE OF RECEIPT OF ALL INFORMATION REQUIRED BY RULE 203: <b>November 9, 2020</b>	
DATE PERMIT TO INSTALL APPROVED: <b>February 5, 2021</b>	SIGNATURE:
DATE PERMIT VOIDED:	SIGNATURE:
DATE PERMIT REVOKED:	SIGNATURE:

## PERMIT TO INSTALL

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## COMMON ACRONYMS

AQD	Air Quality Division
BACT	Best Available Control Technology
CAA	Clean Air Act
CAM	Compliance Assurance Monitoring
CEMS	Continuous Emission Monitoring System
CFR	Code of Federal Regulations
COMS	Continuous Opacity Monitoring System
Department/department/EGLE	Michigan Department of Environment, Great Lakes, and Energy
EU	Emission Unit
FG	Flexible Group
GACS	Gallons of Applied Coating Solids
GC	General Condition
GHGs	Greenhouse Gases
HVLP	High Volume Low Pressure*
ID	Identification
IRSL	Initial Risk Screening Level
ITSL	Initial Threshold Screening Level
LAER	Lowest Achievable Emission Rate
MACT	Maximum Achievable Control Technology
MAERS	Michigan Air Emissions Reporting System
MAP	Malfunction Abatement Plan
MSDS	Material Safety Data Sheet
NA	Not Applicable
NAAQS	National Ambient Air Quality Standards
NESHAP	National Emission Standard for Hazardous Air Pollutants
NSPS	New Source Performance Standards
NSR	New Source Review
PS	Performance Specification
PSD	Prevention of Significant Deterioration
PTE	Permanent Total Enclosure
PTI	Permit to Install
RACT	Reasonable Available Control Technology
ROP	Renewable Operating Permit
SC	Special Condition
SCR	Selective Catalytic Reduction
SNCR	Selective Non-Catalytic Reduction
SRN	State Registration Number
TBD	To Be Determined
TEQ	Toxicity Equivalence Quotient
USEPA/EPA	United States Environmental Protection Agency
VE	Visible Emissions

\*For HVLP applicators, the pressure measured at the gun air cap shall not exceed 10 psig.

## POLLUTANT / MEASUREMENT ABBREVIATIONS

acfm	Actual cubic feet per minute
BTU	British Thermal Unit
°C	Degrees Celsius
CO	Carbon Monoxide
CO <sub>2</sub> e	Carbon Dioxide Equivalent
dscf	Dry standard cubic foot
dscm	Dry standard cubic meter
°F	Degrees Fahrenheit
gr	Grains
HAP	Hazardous Air Pollutant
Hg	Mercury
hr	Hour
HP	Horsepower
H <sub>2</sub> S	Hydrogen Sulfide
kW	Kilowatt
lb	Pound
m	Meter
mg	Milligram
mm	Millimeter
MM	Million
MW	Megawatts
NMOC	Non-Methane Organic Compounds
NO <sub>x</sub>	Oxides of Nitrogen
ng	Nanogram
PM	Particulate Matter
PM10	Particulate Matter equal to or less than 10 microns in diameter
PM2.5	Particulate Matter equal to or less than 2.5 microns in diameter
pph	Pounds per hour
ppm	Parts per million
ppmv	Parts per million by volume
ppmw	Parts per million by weight
psia	Pounds per square inch absolute
psig	Pounds per square inch gauge
scf	Standard cubic feet
sec	Seconds
SO <sub>2</sub>	Sulfur Dioxide
TAC	Toxic Air Contaminant
Temp	Temperature
THC	Total Hydrocarbons
tpy	Tons per year
µg	Microgram
µm	Micrometer or Micron
VOC	Volatile Organic Compounds
yr	Year

## GENERAL CONDITIONS

1. The process or process equipment covered by this permit shall not be reconstructed, relocated, or modified, unless a Permit to Install authorizing such action is issued by the Department, except to the extent such action is exempt from the Permit to Install requirements by any applicable rule. **(R 336.1201(1))**
2. If the installation, construction, reconstruction, relocation, or modification of the equipment for which this permit has been approved has not commenced within 18 months, or has been interrupted for 18 months, this permit shall become void unless otherwise authorized by the Department. Furthermore, the permittee or the designated authorized agent shall notify the Department via the Supervisor, Permit Section, Air Quality Division, Michigan Department of Environment, Great Lakes, and Energy, P.O. Box 30260, Lansing, Michigan 48909-7760, if it is decided not to pursue the installation, construction, reconstruction, relocation, or modification of the equipment allowed by this Permit to Install. **(R 336.1201(4))**
3. If this Permit to Install is issued for a process or process equipment located at a stationary source that is not subject to the Renewable Operating Permit program requirements pursuant to Rule 210 (R 336.1210), operation of the process or process equipment is allowed by this permit if the equipment performs in accordance with the terms and conditions of this Permit to Install. **(R 336.1201(6)(b))**
4. The Department may, after notice and opportunity for a hearing, revoke this Permit to Install if evidence indicates the process or process equipment is not performing in accordance with the terms and conditions of this permit or is violating the Department's rules or the Clean Air Act. **(R 336.1201(8), Section 5510 of Act 451, PA 1994)**
5. The terms and conditions of this Permit to Install shall apply to any person or legal entity that now or hereafter owns or operates the process or process equipment at the location authorized by this Permit to Install. If the new owner or operator submits a written request to the Department pursuant to Rule 219 and the Department approves the request, this permit will be amended to reflect the change of ownership or operational control. The request must include all of the information required by subrules (1)(a), (b), and (c) of Rule 219 and shall be sent to the District Supervisor, Air Quality Division, Michigan Department of Environment, Great Lakes, and Energy. **(R 336.1219)**
6. Operation of this equipment shall not result in the emission of an air contaminant which causes injurious effects to human health or safety, animal life, plant life of significant economic value, or property, or which causes unreasonable interference with the comfortable enjoyment of life and property. **(R 336.1901)**
7. The permittee shall provide notice of an abnormal condition, start-up, shutdown, or malfunction that results in emissions of a hazardous or toxic air pollutant which continue for more than one hour in excess of any applicable standard or limitation, or emissions of any air contaminant continuing for more than two hours in excess of an applicable standard or limitation, as required in Rule 912, to the Department. The notice shall be provided not later than two business days after start-up, shutdown, or discovery of the abnormal condition or malfunction. Written reports, if required, must be filed with the Department within 10 days after the start-up or shutdown occurred, within 10 days after the abnormal condition or malfunction has been corrected, or within 30 days of discovery of the abnormal condition or malfunction, whichever is first. The written reports shall include all of the information required in Rule 912(5). **(R 336.1912)**
8. Approval of this permit does not exempt the permittee from complying with any future applicable requirements which may be promulgated under Part 55 of 1994 PA 451, as amended or the Federal Clean Air Act.
9. Approval of this permit does not obviate the necessity of obtaining such permits or approvals from other units of government as required by law.
10. Operation of this equipment may be subject to other requirements of Part 55 of 1994 PA 451, as amended and the rules promulgated thereunder.

11. Except as provided in subrules (2) and (3) or unless the special conditions of the Permit to Install include an alternate opacity limit established pursuant to subrule (4) of Rule 301, the permittee shall not cause or permit to be discharged into the outer air from a process or process equipment a visible emission of density greater than the most stringent of the following. The grading of visible emissions shall be determined in accordance with Rule 303 (R 336.1303). **(R 336.1301)**
  - a) A six-minute average of 20 percent opacity, except for one six-minute average per hour of not more than 27 percent opacity.
  - b) A visible emission limit specified by an applicable federal new source performance standard.
  - c) A visible emission limit specified as a condition of this Permit to Install.
12. Collected air contaminants shall be removed as necessary to maintain the equipment at the required operating efficiency. The collection and disposal of air contaminants shall be performed in a manner so as to minimize the introduction of contaminants to the outer air. Transport of collected air contaminants in Priority I and II areas requires the use of material handling methods specified in Rule 370(2). **(R 336.1370)**
13. The Department may require the permittee to conduct acceptable performance tests, at the permittee's expense, in accordance with Rule 1001 and Rule 1003, under any of the conditions listed in Rule 1001. **(R 336.2001)**

## EMISSION UNIT SPECIAL CONDITIONS

### EMISSION UNIT SUMMARY TABLE

The descriptions provided below are for informational purposes and do not constitute enforceable conditions.

Emission Unit ID	Emission Unit Description (Including Process Equipment & Control Device(s))	Installation Date / Modification Date	Flexible Group ID
EU03-S1	<p>The 2,4-D (2,4-dichlorophenoxyacetic acid) salt herbicide process. Equipment includes reactors, distillation equipment, storage tanks, rail car loading and unloading stations, and related equipment. Manufacturing equipment is located in the 959 Building. Process vents are treated by the THROX located in 963 Building and a backup carbon control system in EU12b-S1. The tank farm and rail car station also support production of the 2,4-D salt in the EU9 process in 489 Building.</p> <p>This emission unit is subject to the requirements of 40 CFR Part 63, Subparts A and MMM. In addition, processes Subject to MMM are also subject to the equipment leak provisions of the HON (40 CFR Part 63, Subpart H).</p> <p>This emission unit was permitted in PTI 147-20.</p>	8/25/14/ 2/5/2021	FG963THROX-S1 FGPESTICIDES-S1 FGHONFUGITIVES-S1

Changes to the equipment described in this table are subject to the requirements of R 336.1201, except as allowed by R 336.1278 to R 336.1291.

<b>EU03-S1</b> <b>EMISSION UNIT CONDITIONS</b>
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**DESCRIPTION**

The 2,4-D (2,4-dichlorophenoxyacetic acid) salt herbicide process. Equipment includes reactors, distillation equipment, storage tanks, rail car loading and unloading stations, and related equipment. Manufacturing equipment is located in the 959 Building. Process vents are treated by the THROX located in 963 Building and a backup carbon control system in EU12b-S1. The tank farm and rail car station also support production of the 2,4-D salt in the EU9 process in 489 Building.

This emission unit is subject to the requirements of 40 CFR Part 63, Subparts A and MMM. In addition, processes Subject to MMM are also subject to the equipment leak provisions of the HON (40 CFR Part 63, Subpart H).

This emission unit was permitted in PTI 147-20.

**Flexible Group ID:** FG963THROX-S1, FGPESTICIDES-S1, FGHONFUGITIVES-S1

**POLLUTION CONTROL EQUIPMENT**

- Afterburner (THROX – thermal heat recovery oxidation unit located in 963 Building followed by a quench and scrubber).
- Carbon adsorber system located near 948 Building, for a maximum of 31 days (744 hours) per year when the THROX is not available.

**I. EMISSION LIMIT(S)**

NA

**II. MATERIAL LIMIT(S)**

NA

**III. PROCESS/OPERATIONAL RESTRICTION(S)**

1. The permittee shall comply with all provisions of the National Emission Standards for Hazardous Air Pollutants as specified in 40 CFR Part 63 Subparts A and MMM, as they apply to EU03-S1. **(40 CFR Part 63 Subparts A and MMM)**
2. The permittee shall not exhaust process vents in EU03-S1 to the carbon adsorber system in EU12b-S1 for more than 744 hours per 12-month rolling time period as determined at the end of each calendar month. "Process vents in EU03-S1" includes all vents from EU03-S1 except the following:
  - a) Vents from the storage tanks for the 2,4-D salt product
  - b) Emissions from the rail stations for loading 2,4-D salt product**(R 336.1225, R 336.1702(a))**
3. The exhaust gases from depressurization following transfer of material to the choline hydroxide storage tank shall be routed to the THROX for incineration or to the carbon adsorber system in EU-12b-S1. **(R 336.1225, R 336.1702(a))**

#### **IV. DESIGN/EQUIPMENT PARAMETER(S)**

1. The permittee shall not operate equipment that causes emissions from the process vents in EU03-S1 unless either the afterburner (THROX) or the EU12b-S1 carbon adsorber system is installed, maintained, and operated in a satisfactory manner. Storage vessels in EU03-S1 subject to 40 CFR Part 63 Subpart MMM are exempted from this requirement for up to 240 hours per rolling 12-month time period, to the extent allowed by 40 CFR §63.1362(c)(5). Satisfactory operation of the THROX shall be determined according to the requirements of FG963THROX-S1 and FGPESTICIDES-S1 and includes attaining at least 99.9 percent destruction of organic compounds exhausted to the device. Satisfactory operation of the EU12b-S1 carbon adsorber system shall be determined according to the requirements of FGPESTICIDES-S1 and includes attaining at least 98 percent removal of organic compounds exhausted to the device. "Process vents in EU03-S1" includes all vents from EU03-S1 except the following:
  - a) Vents from the storage tanks for the 2,4-D salt product
  - b) Emissions from the rail stations for loading 2,4-D salt product**(R 336.1225, R 336.1702(a), R 336.1910)**
2. The permittee shall not transfer material to the choline hydroxide storage tank unless the vapor balance system is installed, maintained, and operated in a satisfactory manner. **(R 336.1225, R 336.1702(a), R 336.1910)**

#### **V. TESTING/SAMPLING**

Records shall be maintained on file for a period of five years. **(R 336.1201(3))**

NA

#### **VI. MONITORING/RECORDKEEPING**

Records shall be maintained on file for a period of five years. **(R 336.1201(3))**

1. Within 30 days following the end of each calendar month, the permittee shall record, in a satisfactory manner, the monthly and 12-month rolling time period number of hours that process vents from EU03-S1 exhausted to the carbon adsorber system in EU12b-S1. The permittee shall keep all records on file at the facility and make them available to the Department upon request. **(R 336.1225, R 336.1702(a))**
2. The permittee shall keep, in a satisfactory manner, monthly and 12-month rolling time period records of the time, in hours, that storage vessels in EU03-S1 subject to 40 CFR Part 63 Subpart MMM operate under the exemption from emission control provided in SC IV.1. The permittee shall keep all records on file at the facility and make them available to the Department upon request. **(R 336.1225, R 336.1702(a), R 336.1910)**
3. Within 60 days after issuance of PTI No. 147-20, the permittee shall submit a plan to the AQD District Supervisor identifying the operating parameters for FG963THROX-S1 that shall be obtained from the operator or owner of FG963THROX-S1. All operating parameter data in the plan for FG963THROX-S1 shall be obtained within 30 days of the end of the month to which it pertains. If the plan fails to provide adequate information to demonstrate 99.9% destruction of organic compounds, the permittee shall amend the plan. The permittee shall also amend the plan within 45 days after receiving notification from the AQD District Supervisor that the plan does not provide adequate information to demonstrate 99.9% destruction of organic compounds. The permittee shall keep the plan and recorded parameter data on file at the facility and make them available to the Department upon request. **(R 336.1910)**

#### **VII. REPORTING**

NA

**VIII. STACK/VENT RESTRICTION(S)**

The exhaust gases from the stacks listed in the table below shall be discharged unobstructed vertically upwards to the ambient air unless otherwise noted:

<b>Stack &amp; Vent ID</b>	<b>Maximum Exhaust Diameter/Dimensions (inches)</b>	<b>Minimum Height Above Ground (feet)</b>	<b>Underlying Applicable Requirements</b>
1. SV03001 <sup>A</sup> (product storage vent)	30	20	R 336.1225, 40 CFR 52.21(c)&(d)
2. SV03002 <sup>A</sup> (product storage vent)	30	20	R 336.1225, 40 CFR 52.21(c)&(d)
3. SV03003 (product rail car atmospheric vent)	30	15	R 336.1225, 40 CFR 52.21(c)&(d)
4. SV03004 (product rail car atmospheric vent)	30	15	R 336.1225, 40 CFR 52.21(c)&(d)
5. SV03005 (product rail car atmospheric vent)	30	15	R 336.1225, 40 CFR 52.21(c)&(d)
6. SV03006 (product rail car atmospheric vent)	30	15	R 336.1225, 40 CFR 52.21(c)&(d)
7. SV12005 (carbon system atmospheric vent)	4	20	R 336.1225 40 CFR 52.21(c) & (d)
8. SV963THROX <sup>B</sup>	18	80	R 336.1225 40 CFR 52.21(c) & (d)
9. SVEG9A52 <sup>A, C</sup> (product storage)	20	11	R 336.1225 40 CFR 52.21(c) & (d)
<sup>A</sup> This vent is permitted to discharge downward.			
<sup>B</sup> This stack's requirements also appear in the conditions for FG963THROX-S1 (SRN P1027).			
<sup>C</sup> This stack's requirements also appear in the conditions for EU9 (SRN P1028)			

**IX. OTHER REQUIREMENT(S)**

NA

**Footnotes:**

<sup>1</sup> This condition is state only enforceable and was established pursuant to Rule 201(1)(b).