



Corteva Agriscience LLC  
701 Washington Street  
Midland, MI 48667

February 9, 2021

CERTIFIED MAIL  
7020 1810 0001 7156 7950

Caryn Owens  
EGLE Air Quality Division  
120 W Chapin Street  
Cadillac, MI 49601-2158

cc: Chris Hare, EGLE Saginaw Bay District Office, 401 Ketchum Street Suite B, Bay City, MI 48708

**CORTEVA AGRISCIENCE LLC (CORTEVA) RULE 216(2) CHANGE NOTIFICATION: EU03**

Please find attached the notification forms required by Rule 216(2) for changes to The Dow Chemical Company's Renewable Operating Permit (ROP) number MI-ROP-A4033, Section 1.

The 959 Bldg 2,4D salt production facility has received revised special conditions associated with permit to install application 147-20. Corteva requests that these special conditions be included in the renewable operating permit table EU03-S1. This process is represented by table EU03 in permit number MI-ROP-A4033-2017b. An ROP significant modification application was submitted on 3/1/2019 to make the Dow AgroSciences assets in Section 1 of the ROP its own permit. On 5/23/19, notification was received from EGLE that the SRN number of P1028 has been assigned to Dow AgroSciences, LLC. Also note that per the 1/11/21 notification letter, the Dow AgroSciences LLC company name has been changed to Corteva Agriscience LLC, effective 1/1/21.

Attached are the M-001, AI-001 and C-001 forms and marked up ROP conditions with detailed information associated with this change. Corteva will consider this change effective upon receipt of these forms.

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

A handwritten signature in black ink, appearing to read "Steve Gregory", written in a cursive style.

Steve Gregory  
Michigan Hub EHS&S Leader  
3100 James Savage  
Midland, MI 48642  
(989) 486-2479

Attachments





Michigan Department of Environment, Great Lakes, and Energy - Air Quality Division

## RENEWABLE OPERATING PERMIT APPLICATION C-001: CERTIFICATION

*This information is required by Article II, Chapter 1, part 55 (Air Pollution Control) of P.A. 451 of 1994, as amended, and the Federal Clean Air Act of 1990. Failure to provide this information may result in civil and/or criminal penalties. Please type or print clearly.*


**This form is completed and included as part of Renewable Operating Permit (ROP) initial and renewal applications, notifications of change, amendments, modifications, and additional information.**

Form Type C-001	SRN P1028
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Stationary Source Name Corteva Agriscience LLC	
City Midland	County Midland

<b>SUBMITTAL CERTIFICATION INFORMATION</b>	
1. Type of Submittal <i>Check only one box.</i>	
<input type="checkbox"/> Initial Application (Rule 210)	<input checked="" type="checkbox"/> Notification / Administrative Amendment / Modification (Rules 215/216)
<input type="checkbox"/> Renewal (Rule 210)	<input type="checkbox"/> Other, describe on AI-001
2. If this ROP has more than one Section, list the Section(s) that this Certification applies to <u>Section 1</u>	
3. Submittal Media <input type="checkbox"/> E-mail <input type="checkbox"/> FTP <input type="checkbox"/> Disk <input checked="" type="checkbox"/> Paper	
4. Operator's Additional Information ID - Create an Additional Information (AI) ID that is used to provide supplemental information on AI-001 regarding a submittal. <b>AI -EU03</b>	

<b>CONTACT INFORMATION</b>	
Contact Name Patty Worden	Title Environmental Specialist
Phone number 989-898-5129	E-mail address patricia.worden@corteva.com

<b>This form must be signed and dated by a Responsible Official.</b>				
Responsible Official Name Steve Gregory			Title EHS&S Leader	
Mailing address 3100 James Savage				
City Midland	State MI	ZIP Code 48642	County Midland	Country Midland
<b>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.</b>				
 _____ Signature of Responsible Official			_____ 2/9/2021 Date	



**RENEWABLE OPERATING PERMIT  
M-001: RULE 215 CHANGE NOTIFICATION  
RULE 216 AMENDMENT/MODIFICATION APPLICATION**

*This information is required by Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended, and the Federal Clean Air Act of 1990. Failure to obtain a permit required by Part 55 may result in penalties and/or imprisonment.*

1. SRN P1028	2. ROP Number MI-ROP A4033	3. County Midland
4. Stationary Source Name Corteva Agriscience LLC, Michigan Operations		
5. Location Address 701 Washington Street		6. City Midland
7. Submittal Type - <i>The submittal must meet the criteria for the box checked below. Check only one box. Attach a mark-up of the affected ROP pages for applications for Rule 216 changes.</i> <input type="checkbox"/> Rule 215(1) Notification of change. Complete Items 8 – 10 and 14 <input type="checkbox"/> Rule 215(2) Notification of change. Complete Items 8 – 10 and 14 <input type="checkbox"/> Rule 215(3) Notification of change. Complete Items 8 – 11 and 14 <input type="checkbox"/> Rule 215(5) Notification of change. Complete Items 8 – 10 and 14 <input type="checkbox"/> Rule 216(1)(a)(i)-(iv) Administrative Amendment. Complete Items 8 – 10 and 14 <input type="checkbox"/> Rule 216(1)(a)(v) Administrative Amendment. Complete Items 8 – 14. Results of testing, monitoring & recordkeeping must be submitted. See detailed instructions. <input checked="" type="checkbox"/> Rule 216(2) Minor Modification. Complete Items 8 – 12 and 14 <input type="checkbox"/> Rule 216(3) Significant Modification. Complete Items 8 – 12 and 14, and provide any additional information needed on ROP application forms. See detailed instructions. <input type="checkbox"/> Rule 216(4) State-Only Modification. Complete Items 8 – 12 and 14		
8. Effective date of the change. (MM/DD/YYYY) <i>See detailed instructions.</i> 2/9/2021		9. Change in emissions? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
10. Description of Change - <i>Describe any changes or additions to the ROP, including any changes in emissions and/or pollutants that will occur. If additional space is needed, complete an Additional Information form (AI-001).</i> The 959 Bldg 2,4D salt production facility has received revised special conditions associated with permit to install application 147-20 to allow venting to the carbon beds for 31 days/RTM. Corteva requests that these special conditions be included in the renewable operating permit table EU03-S1.		
11. New Source Review Permit(s) to Install (PTI) associated with this application? If Yes, enter the PTI Number(s) 147-20		<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
12. Compliance Status - <i>A narrative compliance plan, including a schedule for compliance, must be submitted using an AI-001 if any of the following are checked No.</i> a. Is the change identified above in compliance with the associated applicable requirement(s)? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No b. Will the change identified above continue to be in compliance with the associated applicable requirement(s)? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No c. If the change includes a future applicable requirement(s), will timely compliance be achieved? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
13. Operator's Additional Information ID - <i>Create an Additional Information (AI) ID for the associated AI-001 form used to provide supplemental information.</i>		AI EU03
14. Contact Name Patty Worden	Telephone No. 989-898-5129	E-mail Address patricia.worden@corteva.com
15. This submittal also updates the ROP renewal application submitted on ___/___/___ <input type="checkbox"/> Yes <input checked="" type="checkbox"/> N/A <i>(If yes, a mark-up of the affected pages of the ROP must be attached.)</i>		

**NOTE: A CERTIFICATION FORM (C-001) SIGNED BY A RESPONSIBLE OFFICIAL MUST ACCOMPANY ALL SUBMITTALS**

For Assistance  
Contact: 800-662-9278

www.michigan.gov/egle

EQP 5775 (Rev.04-2019)



**RENEWABLE OPERATING PERMIT APPLICATION**  
**AI-001: ADDITIONAL INFORMATION**

*This information is required by Article II, Chapter 1, Part 55 (Air Pollution Control) of P.A. 451 of 1994, as amended, and the Federal Clean Air Act of 1990. Failure to obtain a permit required by Part 55 may result in penalties and/or imprisonment. Please type or print clearly. Refer to instructions for additional information to complete this form.*

SRN: P1028

Section Number (if applicable):

1. Additional Information ID

AI-EU03

**Additional Information**

2. Is This Information Confidential?

 Yes  No

Corteva Agriscience LLC requests the changes shown in the attached marked up permit condition pages be rolled into the ROP, per approval of PTI 147-20.





## EU03-S1 EMISSION UNIT CONDITIONS

### 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 ~~will be~~ is located in ~~a new~~ the 959 Building. Process vents are treated by the THROX located in 963 Building and a backup carbon control system in EU12b-S1. The ~~new~~ tank farm and rail car station will 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).

**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 20 31 days (489744 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 480 744 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



Stack & Vent ID	Maximum Exhaust Diameter/Dimensions (inches)	Minimum Height Above Ground (feet)	Underlying Applicable Requirements
3. SV03003 ( <a href="#">product rail car atmospheric vent</a> )	30	15	R 336.1225, 40 CFR 52.21(c)&(d)
4. SV03004 ( <a href="#">product rail car atmospheric vent</a> )	30	15	R 336.1225, 40 CFR 52.21(c)&(d)
5. SV03005 ( <a href="#">product rail car atmospheric vent</a> )	30	15	R 336.1225, 40 CFR 52.21(c)&(d)
6. SV03006 ( <a href="#">product rail car atmospheric vent</a> )	30	15	R 336.1225, 40 CFR 52.21(c)&(d)
7. SV12005 ( <a href="#">carbon system atmospheric vent</a> )	<u>4</u>	<u>20</u>	<u>R 336.1225</u> 40 CFR 52.21(c) & (d)
8. SV963THROX <sup>B</sup>	<u>18</u>	<u>80</u>	<u>R 336.1225</u> 40 CFR 52.21(c) & (d)
9. SVEG9A52 <sup>C</sup> (Intermediate product storage)	<u>20</u>	<u>11</u>	<u>R 336.1225</u> 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).

