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MAR 21 2022

SAGINAW BAY

Corteva Agriscience
Harbor Beach Operations
305 N. Huron Ave
Harbor Beach, MI 48441

March 15, 2022

CERTIFIED MAIL:
7016 1370 0000 8726 7702

Mr. Chris Hare, District Supervisor
Air Quality Division
EGLE– Saginaw Bay District
401 Ketchum St., Suite B
Bay City, MI 48708

CERTIFIED MAIL:
7016 1370 0000 8726 7696

Ms. Jenine Camilleri
Enforcement Unit Supervisor
EGLE, AQD
PO Box 30260
Lansing, MI 48909-7760

RE: SRN B4942, February 24, 2022, Violation Notice Resolution

Affected emission unit – MI-ROP-B4942-2015B, EUProcess

Reason for deviation
Durr, manufacturer of TTU 870, found the stator to rotor gap was outside acceptable limits. On January 17, 2022, a Durr technician recorded gap measurements of 0.13 inches. This gap was closed to 0.015 inches by adjusting stator hanger bolts. Based on input from the Durr technician, the site believes when the Durr technicians adjusted these stator bolts on November 29, 2021, while performing planned tadpole gasket replacement work, they were improperly tightened resulting in an unacceptable gap.

Action taken to prevent reoccurrence
The facility will develop a procedure to assess TTU 870 after maintenance is performed. This procedure will include measuring the stator to rotor gap.

This event did not exceed the mass emission limit of 10.4 lb/hr VOC. The aggregate VOC emission for EUProcess, which includes all thermal treatment devices, was approximately 7 lb/hr VOC.

EPA Method 320 measurements were collected in February and March that show acceptable performance:
- February 16, 2022, methanol = 9.0 ppmv, formaldehyde = 1.6 ppmv;
- March 11, 2022, methanol = 1.9 ppmv, formaldehyde = 1.3 ppmv.

If you have any question, please contact Jim McGee at 989-479-5283 or by email at james.mcgee@corteva.com.

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in this report are true, accurate, and complete.

Sincerely,

Kevin Soper
Site Leader & Responsible Official