



GRETCHEN WHITMER
GOVERNOR

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

EGLE
LIESL EICHLER CLARK
DIRECTOR

October 27, 2021

Steve Gregory, Michigan EHS&S Leader
Corteva Agriscience LLC
3100 James Savage
Midland Michigan 48642

SRN: P1028, Midland County

Dear Mr. Gregory:

VIOLATION NOTICE

On June 23, 2021, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Corteva Agriscience LLC (Corteva) located at in Midland, Michigan. The purpose of this inspection was to determine Corteva'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-A4033-2017b;

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
EU13	MI-ROP-A4033-2017b, EU13, SC VI.1: Each month the permittee shall calculate and record emissions from EU13 for the previous calendar month.	Emission tracking spread sheets contained inaccurate data associated with Methanol and Methyl Chloride emitting activities.

During records review for this inspection, it was discovered that the formula for tracking methanol emissions in 2019 and 2020 had been inadvertently changed due to a "copy and paste" error from December 2018 tracking spreadsheet to the January 2019 spreadsheet. As a result, methanol annual emissions reported in 2019 to MAERS were incorrectly reported as 80 pounds but corrected 2019 methanol emissions were 129.4 pounds. Methanol emissions reported for 2020 to MAERS were 353 pounds but corrected emissions were 109 pounds. No violation of permitted emissions occurred.

This is a violation of the recordkeeping specified in MI-ROP-A4033-2017b EU13 Special Condition VI.1.

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On June 25, 2021, Corteva provided the AQD with corrected emission information and verified the methanol emission tracking spreadsheets had been corrected. The Title V Semi-Annual Deviation report submitted on September 13, 2021 also stated that Corteva staff received improved training on the emission tracking spreadsheet data collection and calculations to better identify potential issues as part of the monthly inquiry. Corteva will also include a review of the calculation spreadsheet as part of their annual environmental monitoring.

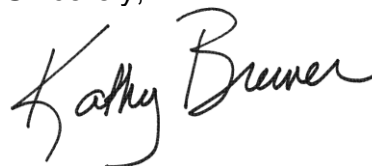
If Corteva has initiated any additional actions necessary to correct the cited violation please submit a written response to this Violation Notice by November 17, 2021 (which coincides with 21 calendar days from the date of this letter).

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

If Corteva 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 violation cited above and for the cooperation that was extended to me during my inspection of EU13 at Corteva. If you have any questions regarding the violation or the actions necessary to bring this facility into compliance, please contact me at brewerk@michigan.gov or the number listed below.

Sincerely,

A handwritten signature in black ink that reads "Kathy Brewer". The signature is written in a cursive style with a large, looped "K" and "B".

Kathy Brewer
Senior Environmental Quality Analyst
Air Quality Division
989-493-2100

cc: Ms. Patty Worden, Corteva
Ms. Mary Ann Dolehanty, EGLE
Dr. Eduardo Olaguer, EGLE
Ms. Jenine Camilleri, EGLE
Mr. Christopher Ethridge, EGLE
Mr. Chris Hare, EGLE