



GRETCHEN WHITMER
GOVERNOR

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



LIESL EICHLER CLARK
DIRECTOR

February 24, 2022

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

SRN: B4942, Huron County

Dear Ms. Callender:

VIOLATION NOTICE

On December 13, 2021, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), received a Rule 912 Initial Notification of an emission limit exceedance by Corteva AgriScience LLC located at 3015 North Huron Avenue, Harbor Beach, Michigan. The purpose of this Rule 912 Initial Notification and subsequent updates was used 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 a review of the initial notification and subsequent updates provided, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
EUPROCESS	ROP No. MI-ROP-B4942-2020a, EUPROCESS, Special Condition (SC) I.5; 40 CFR Part 63, Subpart MMM	Organic HAP emission limit exceedance

A Rule 912 Initial Notification was submitted to the AQD on December 13, 2021. On December 13, 2021, preliminary sampling results taken on December 9, 2021 showed elevated organic HAP emissions at 28 ppmv from catalytic thermal treatment unit (TTU) 870 that had been shut down for scheduled maintenance. In a February 15, 2022 telephone call with the company, emissions appeared to have been elevated for at least 200 hours. This is a violation of MI-ROP-B4942-2020a, EUPROCESS, SC I.5. 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. Corteva AgriScience LLC has the option, when demonstrating compliance with this emission limit, to maintain at least a 98% destruction efficiency. Based on the July 2021 stack test results, the destruction efficiency for TTU 870 was only 95.3%, thus this alternative compliance option could not be used.

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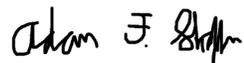
Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by March 17, 2022 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violation occurred; an explanation of the causes and duration of the violation; whether the violation is ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violation 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, 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 violation cited above and for the cooperation that was extended to me during my review of Corteva AgriScience LLC. If you have any questions regarding the violation 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