



Corteva Agriscience  
901 Loveridge Road  
Pittsburg, CA 94565

December 22, 2023

**DELIVERED BY EMAIL:** [Compliance@BAAQMD.gov](mailto:Compliance@BAAQMD.gov)  
**Benjamin Siemens** [bsiemens@baaqmd.gov](mailto:bsiemens@baaqmd.gov)

Jeff Gove  
Director of Enforcement  
Bay Area Air Quality Management District  
375 Beale Street, Suite 600  
San Francisco, CA 94105

TV Tracking #: 831

1.  RECEIVED IN 12/22/2023  
ENFORCEMENT: \_\_\_\_\_

**RE: TITLE V MONITORING REPORT**  
**Corteva Agriscience – Pittsburg Operations, Pittsburg, California (Corteva)**  
**Facility Number A0031**  
**Plant Number 24380**  
**Reporting Period: June 1, 2023 – November 30, 2023**

Corteva Agriscience hereby submits the following Title V Monitoring Report for its Pittsburg Operations for the period noted above.

A Reasonable Inquiry process was followed to review the monitoring requirements of the Title V permit. All required monitoring was performed and after review of the monitoring results all sources were found to be in compliance with the monitoring requirements of Table VII of the Air Permit except the items previously submitted as Title V deviations to the Air District during the reporting period.

Based on information at the completion of the reasonable inquiry process, I certify that the information is true, accurate, and complete to the best of my belief.

If you have any questions regarding this Monitoring Report, please email Suzanne Chaewsky at [Suzanne.chaewsky@corteva.com](mailto:Suzanne.chaewsky@corteva.com).

Sincerely,

James Lipscomb  
Pittsburg Site Director  
Corteva Agriscience

Attachments: Reporting Period 30-Day Reports and 10-Day Notices of Deviation

June 29, 2023

**Delivered by Email:** [Compliance@BAAQMD.gov](mailto:Compliance@BAAQMD.gov)  
[jcarrasco@baaqmd.gov](mailto:jcarrasco@baaqmd.gov)

Jeff Gove  
Director of Enforcement  
Bay Area Air Quality Management District  
375 Beale Street, Suite 600  
San Francisco, CA 94105

**RE: 30-Day Report – Major Facility Permit Non-Compliance Report  
Corteva Agriscience – Pittsburg Operations, Pittsburg, California  
Facility Number A0031  
Plant Number 24380**

Mr. Gove:

Description of Non-Compliance referencing Permit Condition Number:

Source Number:	S-446 Sym-Tet Plant (Chlorpyridines)
Permit Condition Number:	40 CFR Part 63, Subpart FFFF - Miscellaneous Organic Chemical Manufacturing National Emission Standard for Hazardous Air Pollutants (MON MACT)
Describe Non-Compliance:	40 CFR 63, Subpart FFFF 63.2520(c) and 40 CFR 63.10(b)(2)(vii): As specified by the September 12, 2018, 2015 Precompliance Report, when the caustic analyzers associated with caustic scrubbers T-90 and T-91 are out of operation, caustic strength is monitored via grab samples in the scrubber tanks every 12 hours.  12-hour caustic strength sampling records on the T-90 scrubber were missed by eight minutes on 5/16/23 and by two hours 28 minutes on 5/17/23.  The minimum operating limit for caustic strength in T-90 is 3.7%. There were no excess emissions from this event.

Sample Date	Time of Analysis	T-90 NaOH Strength %
05/15/23	7:12 PM	7.03
05/16/23	7:20 AM	6.54
05/16/23	10:46 AM	6.29
05/16/23	2:27 PM	6.63
05/16/23	4:52 PM	6.48
05/17/23	7:20 AM	6.02
05/17/23	10:56 AM	6.11

Root Cause: The root cause of the missed sampling events was determined to be that the Lab operator missed the timeline to collect and analyze samples.

Corrective Action: The corrective actions that were identified from the investigation are:

1. Provide a specific, written, sampling schedule for Lab operators to follow to ensure sampling frequency is met. This action was completed 6/16/23.
2. Direction given to Lab operators by their manager of expectations to follow sampling schedule. This action was completed 6/20/23.

If you have any questions, please contact Suzanne Chaewsky at [suzanne.chaewsky@corteva.com](mailto:suzanne.chaewsky@corteva.com).

I certify that the above information is true, accurate, and complete to the best of my information and belief.

Sincerely,



James Lipscomb  
Pittsburg Site Director  
Corteva Agriscience

Attachment: 10-Day Initial Notification

June 5, 2023

**DELIVERED BY EMAIL:** [Compliance@BAAQMD.gov](mailto:Compliance@BAAQMD.gov)  
[bkwan@baaqmd.gov](mailto:bkwan@baaqmd.gov)

Jeff Gove  
Director of Enforcement  
Bay Area Air Quality Management District  
375 Beale Street, Suite 600  
San Francisco, CA 94105

**RE: Major Facility Permit Non-Compliance Report, 10-Day Notification  
Corteva Agriscience – Pittsburg Operations, Pittsburg, California  
Facility Number A0031  
Plant Number 24380**

Description of Non-Compliance referencing Permit Condition Number

- |    |                          |  |
|----|--------------------------|--|
| 1. | Source Number:           | S-446, Sym-Tet Plant   |
| 2. | Permit Condition Number: | 40 CFR 63, Subpart FFFF – Miscellaneous Organic Chemical Manufacturing National Emission Standard for Hazardous Air Pollutants (MON MACT)  |
| 3. | Describe Non-Compliance: | 40 CFR 63, Subpart FFFF 63.2520(c) and 40 CFR 63.10(b)(2)(vii): As specified by the September 12, 2018, 2015 Precompliance Report, when the caustic analyzers associated with caustic scrubbers T-90 and T-91 are out of operation, caustic strength is monitored via grab samples in the scrubber tanks every 12 hours.<br><br>12-hour caustic strength sampling records on the T-90 scrubber were missed by eight minutes on 5/16/23 and by two hours 28 minutes on 5/17/23. |
| 4. | Submitted By:            | Suzanne Chaewsky ( <a href="mailto:suzanne.chaewsky@corteva.com">suzanne.chaewsky@corteva.com</a> )  |
| 5. | Discovery Date:          | June 1, 2023   |

June 29, 2023

**Delivered by Email:** [Compliance@BAAQMD.gov](mailto:Compliance@BAAQMD.gov)  
[jcarrasco@BAAQMD.gov](mailto:jcarrasco@BAAQMD.gov)

Jeff Gove  
Director of Enforcement  
Bay Area Air Quality Management District  
375 Beale Street, Suite 600  
San Francisco, CA 94105

**RE: 30-Day Report – Major Facility Permit Non-Compliance Report  
Corteva Agriscience – Pittsburg Operations, Pittsburg, California  
Facility Number A0031  
Plant Number 24380**

Mr. Gove:

Description of Non-Compliance referencing Permit Condition Number:

Source Number: S-446 Sym-Tet Plant (Chlorpyridines)

Permit Condition Number: 40CFR63.2450(k)→63.998(b)(3)

Describe Non-Compliance: On 6/5/23, a Continuous Parameter Monitoring System (CPMS) instrument for the T-90 scrubber, a MON control device, malfunctioned. As a result of this instrument failure, there was insufficient data available to calculate the daily average value of caustic flow to the T-90 scrubber. The failed instrument was non-operational for 84 hours and 59 minutes until it was replaced on 6/8/23. While the flowmeter instrument was out of service, SSM procedures were followed and vents were abated by T-91 scrubber.

At the time of the malfunction, the vent flow to the control device was greatly reduced as both the Alpha and Beta production plants were idled.

Per MON regulations (40 CFR 63.2450(a)(1)), this malfunction event is a deviation and not a violation of the MON standard.

Root Cause: This incident was caused by a caustic flowmeter instrument malfunction.

Corrective Action: Corrective action is to follow SSM procedure and ensure vents are abated by T-91 scrubber until failed flowmeter is replaced. This action was completed.

If you have any questions, please contact Suzanne Chaewsky at [suzanne.chaewsky@corteva.com](mailto:suzanne.chaewsky@corteva.com).

I certify that the above information is true, accurate, and complete to the best of my information and belief.

Sincerely,

A handwritten signature in black ink, appearing to read 'JL', with a horizontal line extending to the right.

James Lipscomb  
Pittsburg Site Director  
Corteva Agriscience

Attachment: 10-Day Initial Notification



June 14, 2023

**DELIVERED BY EMAIL: Compliance@BAAQMD.gov**  
**cc: jcarrasco@baaqmd.gov**

Jeff Gove  
Director of Enforcement  
Bay Area Air Quality Management District  
375 Beale Street, Suite 600  
San Francisco, CA 94105

**RE: Major Facility Permit Non-Compliance Report, 10-Day Notification**  
**Corteva Agriscience – Pittsburg Operations, Pittsburg, California**  
**Facility Number A0031**  
**Plant Number 24380**

Description of Non-Compliance referencing Permit Condition Number

1. Source Number: S-446 Sym-Tet Plant (Chlorpyridines)

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2. Permit Condition Number: 40CFR63.2450(k)→63.998(b)(3)

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3. Describe Non-Compliance: 

On 6/5/23, a caustic flow monitoring Instrument associated with T-90 scrubber, a MON control device, malfunctioned. As a result, there were insufficient liquid flow rate monitoring data available to calculate the daily average value to demonstrate compliance. The instrument was replaced on 6/8/23. The instrument was non-operational for 84 hours and 59 minutes.

At the time of the malfunction, the vent flow to the control device was greatly reduced as both the Alpha and Beta processes were idled.

Per MON regulations (40 CFR 63.2450(a)(1)), this malfunction event is a deviation and not a violation of the MON standard.

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4. Submitted By: Suzanne Chaewsky

---
5. Discovery Date: June 5, 2023

---

June 29, 2023

**Delivered by Email:** [Compliance@BAAQMD.gov](mailto:Compliance@BAAQMD.gov)  
[jcarrasco@BAAQMD.gov](mailto:jcarrasco@BAAQMD.gov)

Jeff Gove  
Director of Enforcement  
Bay Area Air Quality Management District  
375 Beale Street, Suite 600  
San Francisco, CA 94105

**RE: 30-Day Report – Major Facility Permit Non-Compliance Report  
Corteva Agriscience – Pittsburg Operations, Pittsburg, California  
Facility Number A0031  
Plant Number 24380**

Mr. Gove:

Description of Non-Compliance referencing Permit Condition Number:

Source Number:	S-48 and S-49 (N-Serve Plant)
Permit Condition Number:	Part 4, Condition #5148
Describe Non-Compliance:	Since 5/14/23, S-48 and S-49 (N-Serve Product Storage Tanks) have not been abated by A-154. The vent recovery system, A-154, was taken offline on 5/14/23 because of equipment failures on the heat exchangers (H-320A & B) that are needed for the vent recovery system operation. Corrosion on the tube sheets and shell body of these exchangers led to an unplanned equipment failure of both units. This equipment had been in service for over 30 years and had reached the end of its serviceable lifespan.

As an interim measure, emissions from the N-Serve Product Storage Tanks (S-48 and S-49) are being abated by a caustic tote.

Other emission sources that would normally vent to A-154 from the H-300 Sym-Tet Processing (S-428) and H-200 Sym-Tet (S-448) were emptied before A-154 failed.



Page 2  
Mr. Jeff Gove  
BAAQMD

On 9/15/22, Corteva submitted a permit application to the BAAQMD for a "like-for-like" replacement of A-154. Corteva is planning to install the new H-320A and H-320B units and place the vent recovery system back in service once BAAQMD issues the permit.

Root Cause: Corrosion on the tube sheets and shell body led to an unplanned equipment failure of the H-320A/B heat exchanger. A-154 was taken offline due to this equipment failure.

Corrective Action: Install new H-320A and H-320B replacement units once Corteva receives permit approval from BAAQMD.

If you have any questions, please contact Suzanne Chaewsky at [suzanne.chaewsky@corteva.com](mailto:suzanne.chaewsky@corteva.com).

I certify that the above information is true, accurate, and complete to the best of my information and belief.

Sincerely,



James Lipscomb  
Pittsburg Site Director  
Corteva Agriscience

Attachment: 10-Day Initial Notification

June 15, 2023

**DELIVERED BY EMAIL:** [Compliance@BAAQMD.gov](mailto:Compliance@BAAQMD.gov)  
[jcarrasco@baaqmd.gov](mailto:jcarrasco@baaqmd.gov)

Jeff Gove  
Director of Enforcement  
Bay Area Air Quality Management District  
375 Beale Street, Suite 600  
San Francisco, CA 94105

**RE: Major Facility Permit Non-Compliance Report, 10-Day Notification  
Corteva Agriscience – Pittsburg Operations, Pittsburg, California  
Facility Number A0031  
Plant Number 24380**

Description of Non-Compliance referencing Permit Condition Number

1. Source Number: S-48 and S-49 Sym-Tet Plant
2. Permit Condition Number: Part 4, Condition #5148
3. Describe Non-Compliance: 

Since 5/14/23, S-48 and S-49 have not been abated by A-154. The vent recovery system, A-154, was idled on 5/14/23 because of corrosion issues on the H-320 A and H-320 B heat exchangers. These issues led to an equipment failure of both units. This equipment has been in service for over 30 years and reached the end of its serviceable lifespan.

As an interim measure, vents from the N-Serve Product Storage Tanks (S-48 and S-49) are being abated by a caustic tote. H-300 Sym-Tet Processing (S-428) and H-200 Sym-Tet (S-448) are empty.

Corteva submitted a permit application to the BAAQMD on 9/15/22 for a “like-for-like” replacement of A-154. Corteva is planning to install the H-320 A and B units and place the vent recovery system back in service once BAAQMD issues the permit.
4. Submitted By: Suzanne Chaewsky ([suzanne.chaewsky@corteva.com](mailto:suzanne.chaewsky@corteva.com))
5. Discovery Date: June 7, 2023

June 29, 2023

**Delivered by Email:** [Compliance@BAAQMD.gov](mailto:Compliance@BAAQMD.gov)  
[jcarrasco@baaqmd.gov](mailto:jcarrasco@baaqmd.gov)

Jeff Gove  
Director of Enforcement  
Bay Area Air Quality Management District  
375 Beale Street, Suite 600  
San Francisco, CA 94105

**RE: 30-Day Report – Major Facility Permit Non-Compliance Report  
Corteva Agriscience – Pittsburg Operations, Pittsburg, California  
Facility Number A0031  
Plant Number 24380**

Mr. Gove:

Description of Non-Compliance referencing Permit Condition Number:

Source Number: S-446 Sym-Tet Plant (Chlorpyridines)

Permit Condition Number: 40 CFR Part 63, Subpart FFFF - Miscellaneous Organic Chemical Manufacturing National Emission Standard for Hazardous Air Pollutants (MON MACT)

Describe Non-Compliance: 40 CFR 63, Subpart FFFF 63.2520(c) and 40 CFR 63.10(b) (2)(vii): As specified by the September 12, 2018, 2015 Precompliance Report, when the caustic analyzers associated with caustic scrubbers T-90 and T-91 are out of operation, caustic strength is monitored via grab samples in the scrubber tanks every 12 hours.

A 12-hour caustic strength sampling records on the T-90 scrubber were missed by one hour 14 minutes on 06/08/23.

The minimum operating limit for caustic strength in T-90 is 3.7%. There were no excess emissions from this event.

Sample Date	Time of Analysis	T-90 NaOH Strength %
06/07/23	3:12 PM	8.3
06/07/23	6:19 PM	8.25
06/08/23	7:33 AM	8.31
06/08/23	11:03 AM	8.21

Root Cause: The root cause of the missed sampling event was determined to be that the Lab operator missed the timeline to collect and analyze a sample.

Corrective Action: The corrective actions that were identified from the investigation are:

1. Provide a specific, written, sampling schedule for Lab operators to follow to ensure sampling frequency is met. This action was completed 6/16/23.
2. Direction given to Lab operators by their manager of expectations to follow sampling schedule. This action was completed 6/20/23.

If you have any questions, please contact Suzanne Chaewsky at [suzanne.chaewsky@corteva.com](mailto:suzanne.chaewsky@corteva.com).

I certify that the above information is true, accurate, and complete to the best of my information and belief.

Sincerely,



James Lipscomb  
Pittsburg Site Director  
Corteva Agriscience

Attachment: 10-Day Initial Notification

June 15, 2023

**DELIVERED BY EMAIL:** [Compliance@BAAQMD.gov](mailto:Compliance@BAAQMD.gov)  
[jcarrasco@baaqmd.gov](mailto:jcarrasco@baaqmd.gov)

Jeff Gove  
Director of Enforcement  
Bay Area Air Quality Management District  
375 Beale Street, Suite 600  
San Francisco, CA 94105

**RE: Major Facility Permit Non-Compliance Report, 10-Day Notification  
Corteva Agriscience – Pittsburg Operations, Pittsburg, California  
Facility Number A0031  
Plant Number 24380**

Description of Non-Compliance referencing Permit Condition Number

1. Source Number: S-446, Sym-Tet Plant
2. Permit Condition Number: 40 CFR 63, Subpart FFFF – Miscellaneous Organic Chemical Manufacturing National Emission Standard for Hazardous Air Pollutants (MON MACT)
3. Describe Non-Compliance: 40 CFR 63, Subpart FFFF 63.2520(c) and 40 CFR 63.10(b)(2)(vii): As specified by the September 12, 2018, 2015 Precompliance Report, when the caustic analyzers associated with caustic scrubbers T-90 and T-91 are out of operation, caustic strength is monitored via grab samples in the scrubber tanks every 12 hours.  
12-hour caustic strength sampling records on the T-90 scrubber were missed by one hour 14 minutes on 06/08/23.
4. Submitted By: Suzanne Chaewsky ([suzanne.chaewsky@corteva.com](mailto:suzanne.chaewsky@corteva.com))
5. Discovery Date: June 8, 2023

July 31, 2023

Delivered by Email: [Compliance@BAAQMD.gov](mailto:Compliance@BAAQMD.gov)  
[jcarrasco@baaqmd.gov](mailto:jcarrasco@baaqmd.gov)

Jeff Gove  
Director of Enforcement  
Bay Area Air Quality Management District  
375 Beale Street, Suite 600  
San Francisco, CA 94105

**RE: 30-Day Report – Major Facility Permit Non-Compliance Report  
Corteva Agriscience – Pittsburg Operations, Pittsburg, California  
Facility Number A0031  
Plant Number 24380**

Mr. Gove:

Description of Non-Compliance referencing Permit Condition Number:

Source Number: S-446 Sym-Tet Plant (Chlorpyridines)

Permit Condition Number: 40 CFR Part 63, Subpart FFFF - Miscellaneous Organic Chemical Manufacturing National Emission Standard for Hazardous Air Pollutants (MON MACT)

Describe Non-Compliance: 40 CFR 63, Subpart FFFF 63.2520(c) and 40 CFR 63.10(b) (2)(vii): As specified by the September 12, 2018, 2015 Precompliance Report, when the caustic analyzers associated with caustic scrubbers T-90 and T-91 are out of operation, caustic strength is monitored via grab samples in the scrubber tanks every 12 hours.

A 12-hour caustic strength sample was delayed on the T-90 scrubber by 50 minutes on 07/15/23.

The minimum operating limit for caustic strength in T-90 is 3.7%. There were no excess emissions from this event.

Sample Date	Time of Analysis	T-90 NaOH Strength %
07/14/23	2:58 PM	12.26
07/14/23	7:28 PM	11.95
07/15/23	8:18 AM	11.22
07/15/23	11:06 AM	11.4

Root Cause: The root cause of the missed sampling event was that the day shift personnel was delayed in taking the required sample within the 12-hour time period.

Corrective Action: The corrective action that was identified from the investigation is to add a Lab technician position on the night shift to ensure additional lab technician availability.

If you have any questions, please contact Suzanne Chaewsky at [suzanne.chaewsky@corteva.com](mailto:suzanne.chaewsky@corteva.com).

I certify that the above information is true, accurate, and complete to the best of my information and belief.

Sincerely,



James Lipscomb  
Pittsburg Site Director  
Corteva Agriscience

Attachment: 10-Day Initial Notification

July 20, 2023

**DELIVERED BY EMAIL:** [Compliance@BAAQMD.gov](mailto:Compliance@BAAQMD.gov)  
[jcarrasco@baaqmd.gov](mailto:jcarrasco@baaqmd.gov)

Jeff Gove  
Director of Enforcement  
Bay Area Air Quality Management District  
375 Beale Street, Suite 600  
San Francisco, CA 94105

**RE: Major Facility Permit Non-Compliance Report, 10-Day Notification  
Corteva Agriscience – Pittsburg Operations, Pittsburg, California  
Facility Number A0031  
Plant Number 24380**

Description of Non-Compliance referencing Permit Condition Number

1. Source Number: S-446, Sym-Tet Plant
2. Permit Condition Number: 40 CFR 63, Subpart FFFF – Miscellaneous Organic Chemical Manufacturing National Emission Standard for Hazardous Air Pollutants (MON MACT)
3. Describe Non-Compliance: 40 CFR 63, Subpart FFFF 63.2520(c) and 40 CFR 63.10(b)(2)(vii): As specified by the September 12, 2018, 2015 Precompliance Report, when the caustic analyzers associated with caustic scrubbers T-90 and T-91 are out of operation, caustic strength is monitored via grab samples in the scrubber tanks every 12 hours.  
A 12-hour caustic strength sampling records on the T-90 scrubber was missed by 50 minutes on 07/15/23.
4. Submitted By: Suzanne Chaewsky ([suzanne.chaewsky@corteva.com](mailto:suzanne.chaewsky@corteva.com))
5. Discovery Date: July 15, 2023



August 16, 2023

**Delivered by Email:** [Compliance@BAAQMD.gov](mailto:Compliance@BAAQMD.gov)  
[jcarrasco@baaqmd.gov](mailto:jcarrasco@baaqmd.gov)

Jeff Gove  
Director of Enforcement  
Bay Area Air Quality Management District  
375 Beale Street, Suite 600  
San Francisco, CA 94105

**RE: 30-Day Report – Major Facility Permit Non-Compliance Report  
Corteve Agriscience – Pittsburg Operations, Pittsburg, California  
Facility Number A0031  
Plant Number 24380**

Mr. Gove:

Description of Non-Compliance referencing Permit Condition Number:

Source Number:	S-137 (T-606C), S-138 (T-606D), and S-139 (T-606E)
Permit Condition Number:	40 CFR Part 63, Subpart NNNNN – Hydrochloric Acid Production (HCl MACT) §63.9005(d), §63.9025(a)(6).
Describe Non-Compliance:	<p>Records to show that the quarterly calibrations were completed for the B-607 pH probe could not be found for the first and second quarter of 2023. It is not known whether the calibrations were completed.</p> <p>The facility's HCl MACT Site Specific Monitoring Plan specifies that this pH probe will be calibrated each quarter to ensure it is measuring properly. The plant maintenance system includes a task to calibrate this instrument quarterly and to document the calibration; however, no record could be found for the first and second quarter of 2023 to demonstrate that the calibrations were completed as required.</p>
Root Cause:	Maintenance did not have a process to ensure completion of the task with the associated documentation prior to marking the compliance task complete.

Corrective Actions:

1. Calibrate the B-607 pH probe to ensure it is measuring correctly. This action was completed on July 25, 2023.
2. Maintenance has developed and implemented a process to close compliance tasks once paperwork is confirmed received.

If you have any questions, please contact Suzanne Chaewsky at [suzanne.chaewsky@corteva.com](mailto:suzanne.chaewsky@corteva.com).

I certify that the above information is true, accurate, and complete to the best of my information and belief.

Sincerely,



James Lipscomb  
Pittsburg Site Director  
Corteva Agriscience

Attachment: 10-Day Initial Notification



July 27, 2023

**DELIVERED BY EMAIL: Compliance@BAAQMD.gov**  
**cc: jcarrasco@BAAQMD.gov**

Jeff Gove  
Director of Enforcement  
Bay Area Air Quality Management District  
375 Beale Street, Suite 600  
San Francisco, CA 94105

**RE: Major Facility Permit Non-Compliance Report, 10-Day Notification**  
**Corteva Agriscience – Pittsburg Operations, Pittsburg, California**  
**Facility Number A0031**  
**Plant Number 24380**

Description of Non-Compliance referencing Permit Condition Number

1. Source Number: S-137 (T-606C), S-138 (T-606D), and S-139 (T-606E)
2. Permit Condition Number: 40 CFR Part 63, Subpart NNNNN – Hydrochloric Acid Production (HCl MACT) 63.9005(d).
3. Describe Non-Compliance: Records could not be found to document that the B-607 pH probe was calibrated during the 1<sup>st</sup> and 2<sup>nd</sup> quarters of 2023. The HCl MACT Site Specific Monitoring Plan for this facility requires that this pH probe is calibrated each quarter.
4. Submitted By: William Hewlett ([William.hewlett@corteva.com](mailto:William.hewlett@corteva.com))
5. Discovery Date: July 20, 2023

August 17, 2023

**Delivered by Email:** [Compliance@BAAQMD.gov](mailto:Compliance@BAAQMD.gov)  
[jcarrasco@baaqmd.gov](mailto:jcarrasco@baaqmd.gov)

Jeff Gove  
Director of Enforcement  
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**RE: 30-Day Report – Major Facility Permit Non-Compliance Report  
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Mr. Gove:

Description of Non-Compliance referencing Permit Condition Number:

Source Number:	S-137 (T-606C), S-138 (T-606D), and S-139 (T-606E)
Permit Condition Number:	40 CFR Part 63, Subpart NNNNN – Hydrochloric Acid Production (HCl MACT) §63.9005(d), §63.9025(a)(6).
Describe Non-Compliance:	<p>Records to show that the quarterly calibrations were completed for the B-607 pH probe could not be found for the first and second quarter of 2023. It is not known whether the calibrations were completed.</p> <p>The facility's HCl MACT Site Specific Monitoring Plan specifies that this pH probe will be calibrated each quarter to ensure it is measuring properly. The plant maintenance system includes a task to calibrate this instrument quarterly and to document the calibration; however, no record could be found for the first and second quarter of 2023 to demonstrate that the calibrations were completed as required.</p>
Root Cause:	Maintenance did not have a process to ensure completion of the task with the associated documentation prior to marking the compliance task complete.

Corrective Actions:

1. Calibrate the B-607 pH probe to ensure it is measuring correctly. This action was completed on July 25, 2023.
2. Maintenance has developed and implemented a process to close compliance tasks once paperwork is confirmed received.

If you have any questions, please contact Suzanne Chaewsky at [suzanne.chaewsky@corteva.com](mailto:suzanne.chaewsky@corteva.com).

I certify that the above information is true, accurate, and complete to the best of my information and belief.

Sincerely,



James Lipscomb  
Pittsburg Site Director  
Corteva Agriscience

Attachment: 10-Day Initial Notification



July 27, 2023

**DELIVERED BY EMAIL: Compliance@BAAQMD.gov**  
**cc: jcarrasco@BAAQMD.gov**

Jeff Gove  
Director of Enforcement  
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1. Source Number: S-137 (T-606C), S-138 (T-606D), and S-139 (T-606E)
2. Permit Condition Number: 40 CFR Part 63, Subpart NNNNN – Hydrochloric Acid Production (HCl MACT) 63.9005(d).
3. Describe Non-Compliance: Records could not be found to document that the B-607 pH probe was calibrated during the 1<sup>st</sup> and 2<sup>nd</sup> quarters of 2023. The HCl MACT Site Specific Monitoring Plan for this facility requires that this pH probe is calibrated each quarter.
4. Submitted By: William Hewlett ([William.hewlett@corteva.com](mailto:William.hewlett@corteva.com))
5. Discovery Date: July 20, 2023

September 12, 2023

**DELIVERED BY EMAIL:** [Compliance@BAAQMD.gov](mailto:Compliance@BAAQMD.gov)  
**cc:** [jcarrasco@BAAQMD.gov](mailto:jcarrasco@BAAQMD.gov)

Jeff Gove  
Director of Enforcement  
Bay Area Air Quality Management District  
375 Beale Street, Suite 600  
San Francisco, CA 94105

**RE: Major Facility Permit Non-Compliance Report, 30-Day Report  
Corteva Agriscience – Pittsburg Operations, Pittsburg, California  
Facility Number A0031  
Plant Number 24380**

Description of Non-Compliance referencing Permit Condition Number

Source Number: S-151 (T-614)

Permit Condition Number: Condition 11276

Describe Non-Compliance: On August 14, 2023, the MS HAF (S-336) and the ST HAF (S-389) were simultaneously offline for three separate occurrences while material was stored in T-614 storage tank. The MS HAF was offline during the following time periods due to operational problems with quench pumps P-33 A and B:

1. 8/14/23 14:40 – 8/14/23 15:34 (P-33A offline for 54 minutes)
2. 8/14/23 16:03 – 8/14/23 17:45 (P-33B offline for 102 minutes)
3. 8/14/23 23:00 – 8/15/23 8:45 (P-33B offline for 585 minutes)

The MS HAF was fully operational with a spare quench pump P-33A by 8:45 AM on August 15, 2023.

The ST HAF was already offline for a planned shutdown during these three occurrences.

During the time when both HAF units were down, no excess emissions occurred based on process transmitter data which indicates that all emissions were contained in T-614 and the associated closed vent line during each downtime event.

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Root Cause:

The root cause of the MS HAF unit going offline was determined to be a mechanical failure of quench pumps P-33 A and B; a determination will be made if acid permeation of the pump liner occurred. The MS HAF is programmed to shut down if the in-service P-33 pump (either A or B) fails.

Corrective Actions:

---

Repair/Replace the pump to have the MS HAF back on-line as quickly as possible.

1. Evaluate current preventative maintenance for the pump to see possible options for improved reliability.
  2. Evaluate alternate materials of construction for the pump to reduce a potential for acid permeation of the pump liner.
- 

If you have any questions, please contact [suzanne.chaewsky@corteva.com](mailto:suzanne.chaewsky@corteva.com).

I certify that the above information is true, accurate, and complete to the best of my information and belief.

Sincerely,



James Lipscomb  
Pittsburg Site Director  
Corteva Agriscience

Attachment: 10-Day Initial Notification



August 15, 2023

**DELIVERED BY EMAIL: Compliance@BAAQMD.gov**  
**cc: jcarrasco@BAAQMD.gov**

Jeff Gove  
Director of Enforcement  
Bay Area Air Quality Management District  
375 Beale Street, Suite 600  
San Francisco, CA 94105

**RE: Major Facility Permit Non-Compliance Report, 10-Day Notification**  
**Corteva Agriscience – Pittsburg Operations, Pittsburg, California**  
**Facility Number A0031**  
**Plant Number 24380**

Description of Non-Compliance referencing Permit Condition Number

- |                             |   |
|-----------------------------|---|
| 1. Source Number:           | S-151 (T-614)   |
| 2. Permit Condition Number: | Condition 11267   |
| 3. Describe Non-Compliance: | <p>On August 14, 2023, the MS HAF (S-336) and the ST HAF (S-389) were both offline during 3 separate occurrences. Starting on August 14, 2023, the MS HAF was offline during the following time periods due to reliability issue with quench pump P-33B:</p> <ul style="list-style-type: none"><li>• 8/14/23 14:40 – 8/14/23 15:34 (offline for 54 minutes)</li><li>• 8/14/23 16:03 – 8/14/23 17:45 (offline for 102 minutes)</li><li>• 8/14/23 23:00 – 8/15/23 8:45 (offline for 585 minutes)</li></ul> <p>The ST HAF was already offline for a planned shutdown during these 3 occurrences. The MS HAF was put back online with a spare quench pump P-33A by 8:45 AM on August 15, 2023. Process transmitter data indicates that all emissions were contained in T-614 and the associated closed vent line during this event.</p> |
| 4. Submitted By:            | William Hewlett (William.hewlett@corteva.com)   |
| 5. Discovery Date:          | August 14, 2023   |

August 15, 2023

**DELIVERED BY EMAIL: Compliance@BAAQMD.gov**  
**cc: jcarrasco@BAAQMD.gov**

Jeff Gove  
Director of Enforcement  
Bay Area Air Quality Management District  
375 Beale Street, Suite 600  
San Francisco, CA 94105

**RE: Major Facility Permit Non-Compliance Report, 10-Day Notification**  
**Corteva Agriscience – Pittsburg Operations, Pittsburg, California**  
**Facility Number A0031**  
**Plant Number 24380**

Description of Non-Compliance referencing Permit Condition Number

- |                             |   |
|-----------------------------|---|
| 1. Source Number:           | S-151 (T-614)   |
| 2. Permit Condition Number: | Condition 11267   |
| 3. Describe Non-Compliance: | <p>On August 14, 2023, the MS HAF (S-336) and the ST HAF (S-389) were both offline during 3 separate occurrences. Starting on August 14, 2023, the MS HAF was offline during the following time periods due to reliability issue with quench pump P-33B:</p> <ul style="list-style-type: none"><li>• 8/14/23 14:40 – 8/14/23 15:34 (offline for 54 minutes)</li><li>• 8/14/23 16:03 – 8/14/23 17:45 (offline for 102 minutes)</li><li>• 8/14/23 23:00 – 8/15/23 8:45 (offline for 585 minutes)</li></ul> <p>The ST HAF was already offline for a planned shutdown during these 3 occurrences. The MS HAF was put back online with a spare quench pump P-33A by 8:32 AM on August 15, 2023. Process transmitter data indicates that all emissions were contained in T-614 and the associated closed vent line during this event.</p> |
| 4. Submitted By:            | William Hewlett (William.hewlett@corteva.com)   |
| 5. Discovery Date:          | August 14, 2023   |

October 26, 2023

**Delivered by Email:** [Compliance@BAAQMD.gov](mailto:Compliance@BAAQMD.gov)  
[jcarrasco@BAAQMD.gov](mailto:jcarrasco@BAAQMD.gov)

Jeff Gove  
Director of Enforcement  
Bay Area Air Quality Management District  
375 Beale Street, Suite 600  
San Francisco, CA 94105

**RE: 30-Day Report – Major Facility Permit Non-Compliance Report  
Corteva Agriscience – Pittsburg Operations, Pittsburg, California  
Facility Number A0031  
Plant Number 24380**

Mr. Gove:

Description of Non-Compliance referencing Permit Condition Number:

Source Number:	S-446 Sym-Tet Plant (Chlorpyridines)
Permit Condition Number:	40 CFR Subpart FFFF - Miscellaneous Organic Chemical Manufacturing (MON MACT) 63.2450(a)(2), 63.2450(e)(6)
Describe Non-Compliance:	During startup of the PSA on 10/03/23 and 10/04/23, the ST HAF was not receiving vents causing the vents to be diverted to the PSA while PSA what not running. This caused vents to be released to atmosphere without removing OHAP by an approved MON abatement device.

Event 1

10/03/23 – Five minutes duration (2:19 AM – 2:24 AM) and an estimated release of 0.02 pounds of carbon tetrachloride.

Event 2

10/04/23 – Two minute duration (12:21 PM – 12:23 PM) and an estimated release of 0.008 pounds of carbon tetrachloride.

The response action taken for each event to minimize emissions was to bring both the PSA and ST HAF back online.

Per MON-MACT 63.2450(a)(2), the plant must be in compliance with the applicable emission limits at all times.

Root Cause:

Event 1

The bypass for the PSA was open following a source test completed earlier in the day at the ST HAF. Upon startup of the PSA, an alarm was activated indicating that a bypass was occurring. At which time, operations took immediate action to route the emissions to the ST HAF.

Event 2

By design, when the Alpha distillation plant is in the bottoms fill step for any of their columns, the valve from the knock-out pot (T-146) to the ST HAF closes and the valve from T-146 to the PSA opens. At the time of the occurrence, the PSA was in the process of starting up.

Corrective Action:

1. Update the source testing procedure to ensure that the bypass is in the non-diverting position prior to venting emissions.
2. Update process programming to add a condition that would prevent the Alpha bottoms fill step from occurring while the PSA is down.

If you have any questions, please contact Suzanne Chaewsky at [suzanne.chaewsky@corteva.com](mailto:suzanne.chaewsky@corteva.com).

I certify that the above information is true, accurate, and complete to the best of my information and belief.

Sincerely,



James Lipscomb  
Pittsburg Site Director  
Corteva Agriscience

Attachment: 10-Day Initial Notification

October 9, 2023

**DELIVERED BY EMAIL: Compliance@BAAQMD.gov**  
**cc: Janet Carrasco**

Jeff Gove  
Director of Enforcement  
Bay Area Air Quality Management District  
375 Beale Street, Suite 600  
San Francisco, CA 94105

**RE: Major Facility Permit Non-Compliance Report, 10-Day Notification**  
**Corteva Agriscience – Pittsburg Operations, Pittsburg, California**  
**Facility Number A0031**  
**Plant Number 24380**

Description of Non-Compliance referencing Permit Condition Number

1. Source Number: S-446 Sym-Tet Plant (Chlorpyridines)
2. Permit Condition Number: 40 CFR Part 63, Subpart FFFF - Miscellaneous Organic Chemical Manufacturing (MON MACT)
3. Describe Non-Compliance: 

During startup of the PSA on 10/03/23 and 10/04/23, the ST HAF had shut down causing the vents to be diverted to the PSA while the PSA was in bypass:

  - 10/03/23 – One minute duration and estimated release of 0.02 pounds of carbon tetrachloride.
  - 10/04/23 – Five minute duration and estimated release of 0.004 pounds of carbon tetrachloride.

The response action taken for each event to minimize emissions was to bring both the PSA and ST HAF back online.

Per MON-MACT 63.2450(a)(2), the plant must be in compliance with the emission limits and work practice standards in Table 1 at all times and meet the notification, reporting, and recordkeeping requirements.
4. Submitted By: Suzanne Chaewsky
5. Discovery Dates 10/03/23 and 10/04/23



November 15, 2023

**Delivered by Email:** [Compliance@BAAQMD.gov](mailto:Compliance@BAAQMD.gov)  
[bsiemens@BAAQMD.gov](mailto:bsiemens@BAAQMD.gov)

Jeff Gove  
Director of Enforcement  
Bay Area Air Quality Management District  
375 Beale Street, Suite 600  
San Francisco, CA 94105

**RE: 30-Day Report – Major Facility Permit Non-Compliance Report  
Corteva Agriscience – Pittsburg Operations, Pittsburg, California  
Facility Number A0031  
Plant Number 24380**

Mr. Gove:

Description of Non-Compliance referencing Permit Condition Number:

Source Number:	S-151 (T-614)
Permit Condition Number:	Part 1 Condition #11267
Describe Non-Compliance:	On October 18, 2023, the MS HAF (S-336) and the ST HAF (S-389) were both offline for 15 hours and 40 minutes while T-614 was storing a non-exempt material (carbon tetrachloride). On October 18, 2023, both HAF units shut down at 12:37 PM due to an unplanned site wide power outage by the local utility company. The MS HAF was back up and fully running on October 19, 2023, at 4:18 AM. Process transmitter data indicate that all emissions were contained in T-614 and the associated closed vent line during this event.

Root Cause:	The unplanned power outage caused both the ST HAF and MS HAF to shut down. The power was restored to the site at 11:30 pm on October 18 <sup>th</sup> , 2023. The MS HAF began normal start-up operations at 2:39 am, and it was fully running at 4:18 am on October 19 <sup>th</sup> , 2023.
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Corrective Action:	Emissions during the power outage were bottled up and not vented to both HAF units were not operating.
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If you have any questions, please contact Suzanne Chaewsky at [suzanne.chaewsky@corteva.com](mailto:suzanne.chaewsky@corteva.com).

Page 2  
Mr. Jeff Gove  
BAAQMD

I certify that the above information is true, accurate, and complete to the best of my information and belief.

Sincerely,

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

James Lipscomb  
Pittsburg Site Director  
Corteva Agriscience

Attachment: 10-Day Initial Notification





October 26, 2023

**DELIVERED BY EMAIL:** [Compliance@BAAQMD.gov](mailto:Compliance@BAAQMD.gov)

cc: [jcarrasco@baaqmd.gov](mailto:jcarrasco@baaqmd.gov)

Jeff Gove  
Director of Enforcement  
Bay Area Air Quality Management District  
375 Beale Street, Suite 600  
San Francisco, CA 94105

**RE: Major Facility Permit Non-Compliance Report, 10-Day Notification  
Corteva Agriscience – Pittsburg Operations, Pittsburg, California  
Facility Number A0031  
Plant Number 24380**

Description of Non-Compliance referencing Permit Condition Number

1. Source Number: S-151 (T-614)
2. Permit Condition Number: Part 1 Condition #11267
3. Describe Non-Compliance: On October 18,2023, the MS HAF (S-336) and the ST HAF (S-389) were both offline for 15 hours and 40 minutes while T-614 was storing a non-exempt material (carbon tetrachloride). On October 18, 2023, both HAF units shut down at 12:39 PM due to an unplanned site wide power outage by the local utility company. The MS HAF was back up and fully running on October 19, 2023, at 4:18 AM. Process transmitter data indicate that all emissions were contained in T-614 and the associated closed vent line during this event.
4. Submitted By: Suzanne Chaewsky ([suzanne.chaewsky@corteva.com](mailto:suzanne.chaewsky@corteva.com))
5. Discovery Date: October 18, 2023

November 15, 2023

**Delivered by Email:** [Compliance@BAAQMD.gov](mailto:Compliance@BAAQMD.gov)  
[bsiemens@BAAQMD.gov](mailto:bsiemens@BAAQMD.gov)

Jeff Gove  
Director of Enforcement  
Bay Area Air Quality Management District  
375 Beale Street, Suite 600  
San Francisco, CA 94105

**RE: 30-Day Report – Major Facility Permit Non-Compliance Report  
Corteva Agriscience – Pittsburg Operations, Pittsburg, California  
Facility Number A0031  
Plant Number 24380**

Mr. Gove:

Description of Non-Compliance referencing Permit Condition Number:

Source Number:	S-48 and S-49 N-Serve Storage Tanks, T-19A and T-19B (Chlorpyridines)
Permit Condition Number:	Part 4, Condition #5148 Permit to Operate; Part 6, Condition #5148 (Permit Condition in Authority to Construct issued 7/24/2023)
Describe Non-Compliance:	Due to an unplanned site wide power outage by the local utility company, on 10/18/23 between 12:37 PM and 11:30 PM. S-48 and S-49 (N-Serve Product Storage Tanks) were not vented to A-154 (Vent Recovery System) during the power outage. During this time, the tank vents were closed, by design, to bottle up emissions until the control system was back online.
Root Cause:	Determined to be a direct result of an unplanned site wide power outage by the local utility company.
Corrective Action:	The S-48 and S-49 vents were bottled up and not vented during the power outage.

Page 2  
Mr. Jeff Gove  
BAAQMD

If you have any questions, please contact Suzanne Chaewsky at [suzanne.chaewsky@corveva.com](mailto:suzanne.chaewsky@corveva.com).

I certify that the above information is true, accurate, and complete to the best of my information and belief.

Sincerely,

A handwritten signature in black ink, appearing to read "JLipscomb", with a stylized flourish at the end.

James Lipscomb  
Pittsburg Site Director  
Corteva Agriscience

Attachment: 10-Day Initial Notification

October 26, 2023

**DELIVERED BY EMAIL:** [Compliance@BAAQMD.gov](mailto:Compliance@BAAQMD.gov)  
[jcarrasco@baaqmd.gov](mailto:jcarrasco@baaqmd.gov)

Jeff Gove  
Director of Enforcement  
Bay Area Air Quality Management District  
375 Beale Street, Suite 600  
San Francisco, CA 94105

**RE: Major Facility Permit Non-Compliance Report, 10-Day Notification  
Corteva Agriscience – Pittsburg Operations, Pittsburg, California  
Facility Number A0031  
Plant Number 24380**

Description of Non-Compliance referencing Permit Condition Number

1. Source Number: S-48 and S-49 N-Serve Storage Tanks, T-19A and T-19B (Chlorpyridines)
2. Permit Condition Number: Part 4, Condition #5148 Permit to Operate; Part 6, Condition #5148 (Permit Condition in Authority to Construct issued 7/24/2023)
3. Describe Non-Compliance: Due to an unplanned site wide power outage by the local utility company, on 10/18/23 between 12:37 PM and 11:30 PM, S-48 and S-49 (N-Serve Product Storage Tanks) were not abated by the Vent Recovery System A-154 (new nomenclature A-415). There were no excess emissions during this period because the S-48 and S-49 vents were blocked during this period.
4. Submitted By: Suzanne Chaewsky ([suzanne.chaewsky@corteva.com](mailto:suzanne.chaewsky@corteva.com))
5. Discovery Date: October 18, 2023

November 15, 2023

**Delivered by Email:** [Compliance@BAAQMD.gov](mailto:Compliance@BAAQMD.gov)  
[bsiemens@BAAQMD.gov](mailto:bsiemens@BAAQMD.gov)

Jeff Gove  
Director of Enforcement  
Bay Area Air Quality Management District  
375 Beale Street, Suite 600  
San Francisco, CA 94105

**RE: 30-Day Report – Major Facility Permit Non-Compliance Report  
Corteva Agriscience – Pittsburg Operations, Pittsburg, California  
Facility Number A0031  
Plant Number 24380**

Mr. Gove:

Description of Non-Compliance referencing Permit Condition Number:

Source Number: S-446 Sym-Tet Plant (Chlorpyridines)

Permit Condition Number: 40 CFR Subpart FFFF - Miscellaneous Organic Chemical  
Manufacturing (MON MACT) §63.2450(a)(2),  
§63.2450(e)(6), BAAQMD Regulation 1-301

Describe Non-Compliance: As a direct result of an unplanned power outage by the local  
utility company, there was a release of excess emissions at  
the facility.

Starting at around 12:50 PM and ending at 1:25 PM for a  
duration of 35 minutes, a mixture of chlorine, hydrogen  
chloride, and carbon tetrachloride was released to  
atmosphere from two vent stacks in the Chlorpyridines  
MCPU. Current calculations indicate that a total of 233  
pounds was released with the following breakdown, by  
chemical: 88 pounds chlorine, 38 pounds hydrochloric acid,  
and 107 pounds of carbon tetrachloride.

Root Cause: During normal plant operations, process vents in the Alpha and Beta systems (within the Chlorpyridines MCPU) are vented from the process vent header to the T-90/91/B-91 (scrubber system) and then to the PSA.

The unplanned power outage caused the scrubber pumps and the instrument air system to shut down. A plugged valve on the nitrogen system (backup instrument air) resulted in process vents being redirected to a non-MON approved emergency caustic scrubber system (B-106 and T-124B) then to atmosphere, bypassing the normal control system.

Corrective Action:

1. Within five minutes of discovering the plugged valve, operations staff manually opened the nitrogen valve to redirect process vents back to the MON approved control device (T-90/91/B-91 scrubber system).
2. Evaluate and improve preventive measures associated with the backup nitrogen instrument air system.
3. Evaluate the vent design to identify and implement improvements to minimize air emissions to the atmosphere during a site wide power outage.

If you have any questions, please contact Suzanne Chaewsky at [suzanne.chaewsky@corteva.com](mailto:suzanne.chaewsky@corteva.com).

I certify that the above information is true, accurate, and complete to the best of my information and belief.

Sincerely,



James Lipscomb  
Pittsburg Site Director  
Corteva Agriscience

Attachment: 10-Day Initial Notification

October 26, 2023

**DELIVERED BY EMAIL:** [Compliance@BAAQMD.gov](mailto:Compliance@BAAQMD.gov)  
**cc:** [jcarrasco@baaqmd.gov](mailto:jcarrasco@baaqmd.gov)

Jeff Gove  
Director of Enforcement  
Bay Area Air Quality Management District  
375 Beale Street, Suite 600  
San Francisco, CA 94105

**RE: Major Facility Permit Non-Compliance Report, 10-Day Notification  
Corteva Agriscience – Pittsburg Operations, Pittsburg, California  
Facility Number A0031  
Plant Number 24380**

Description of Non-Compliance referencing Permit Condition Number

1. Source Number: S-446 Sym-Tet Plant (Chlorpyridines)
2. Permit Condition Number: 40 CFR Subpart FFFF - Miscellaneous Organic Chemical Manufacturing (MON MACT) 63.2450(a)(2), 63.2450(e)(6), BAAQMD Regulation 1-301
3. Describe Non-Compliance: 

As a direct result of an unplanned power outage by the local utility company, there was a release of excess emissions at the facility. Starting at around 12:50 PM and ending at 1:25 PM for a duration of 35 minutes, a mixture of chlorine, hydrogen chloride, and carbon tetrachloride was released to atmosphere from two vent stacks in the 660 Block operation. Current calculations indicate that a total of 233 pounds was released with the following breakdown, by chemical: 87.9 pounds chlorine, 38.5 pounds hydrochloric acid, and 106.6 pounds of carbon tetrachloride.

Notification of the event was made to the National Response Center, the Contra Costa County Sheriff, the Contra Costa Health Services, Hazardous Materials Programs, and State Emergency Response Commission.
4. Submitted By: Suzanne Chaewsky ([suzanne.chaewsky@corteva.com](mailto:suzanne.chaewsky@corteva.com))
5. Discovery Date: October 18, 2023

November 15, 2023

**Delivered by Email:** [Compliance@BAAQMD.gov](mailto:Compliance@BAAQMD.gov)  
[bsiemens@BAAQMD.gov](mailto:bsiemens@BAAQMD.gov)

Jeff Gove  
Director of Enforcement  
Bay Area Air Quality Management District  
375 Beale Street, Suite 600  
San Francisco, CA 94105

**RE: 30-Day Report – Major Facility Permit Non-Compliance Report  
Corteva Agriscience – Pittsburg Operations, Pittsburg, California  
Facility Number A0031  
Plant Number 24380**

Mr. Gove:

Description of Non-Compliance referencing Permit Condition Number:

Source Number:	S-446 Sym-Tet Plant (Chlorpyridines)
Permit Condition Number:	40 CFR Part 63, Subpart FFFF - Miscellaneous Organic Chemical Manufacturing (MON MACT) §63.2520(d)(2)(i), §63.2525(n)
Describe Non-Compliance:	<p>While reviewing the Chlorpyridines closed vent system diagram concerning the release event from October 18, 2023, Corteva found two different and separate bypasses to atmosphere via non-MON regulated control devices that had not been identified in the Notice of Compliance Status (NOCS).</p> <p>Valid records from the flow indicators on each of the two bypass lines are not available for four minutes as a result of a temporary loss of server connectivity due to the October 18, 2023, unplanned power outage.</p>
Root Cause:	The two bypasses are required to be identified in the MON NOCS for the MCPU.
Corrective Action:	Update NOCS to include the two bypasses.

If you have any questions, please contact Suzanne Chaewsky at [suzanne.chaewsky@corteva.com](mailto:suzanne.chaewsky@corteva.com).



Page 2  
Mr. Jeff Gove  
BAAQMD

I certify that the above information is true, accurate, and complete to the best of my information and belief.

Sincerely,

A handwritten signature in black ink, appearing to read 'JLipscomb', with a stylized flourish at the end.

James Lipscomb  
Pittsburg Site Director  
Corteva Agriscience

Attachment: 10-Day Initial Notification

November 2, 2023

**DELIVERED BY EMAIL: Compliance@BAAQMD.gov**  
**cc: Janet Carrasco**

Jeff Gove  
Director of Enforcement  
Bay Area Air Quality Management District  
375 Beale Street, Suite 600  
San Francisco, CA 94105

**RE: Major Facility Permit Non-Compliance Report, 10-Day Notification**  
**Corteva Agriscience – Pittsburg Operations, Pittsburg, California**  
**Facility Number A0031**  
**Plant Number 24380**

Description of Non-Compliance referencing Permit Condition Number

- |    |                          |  |
|----|--------------------------|--|
| 1. | Source Number:           | S-446 Sym-Tet Plant (Chlorpyridines)   |
| 2. | Permit Condition Number: | 40 CFR Part 63, Subpart FFFF - Miscellaneous Organic Chemical Manufacturing (MON MACT) §63.2520(d)(2)(i), §63.2525(n)<br>40 CFR Part 63, Subpart SS – Standards for Closed Vent Systems and Control Devices §63.998(d)(1)(ii)  |
| 3. | Describe Non-Compliance: | While reviewing the Chlorpyridines closed vent system diagram to better understand the release event from October 18, 2023, Corteva discovered two different and separate bypasses to atmosphere via non-MON regulated control devices that were not identified in the Notice of Compliance Status (NOCS).<br><br>Valid records from the flow indicators on each of the two bypass lines were missing for four minutes as a result of a temporary loss of server connectivity due to the October 18, 2023, unplanned power outage. |
| 4. | Submitted By:            | Suzanne Chaewsky ( <a href="mailto:suzanne.chaewsky@corteva.com">suzanne.chaewsky@corteva.com</a> )  |
| 5. | Discovery Date           | 10/26/23   |

December 6, 2023

**Delivered by Email:** [Compliance@BAAQMD.gov](mailto:Compliance@BAAQMD.gov)  
[bsiemens@BAAQMD.gov](mailto:bsiemens@BAAQMD.gov)

Jeff Gove  
Director of Enforcement  
Bay Area Air Quality Management District  
375 Beale Street, Suite 600  
San Francisco, CA 94105

**RE: 30-Day Report – Major Facility Permit Non-Compliance Report  
Corteva Agriscience – Pittsburg Operations, Pittsburg, California  
Facility Number A0031  
Plant Number 24380**

Mr. Gove:

Description of Non-Compliance referencing Permit Condition Number:

Source Number: A-415 (H-320 A/B) (Chlorpyridines)

Permit Condition Number: Part 9 of Condition #5148  
Authority to Construct for AN 31900 on July 24, 2023

Describe Non-Compliance: The initial source test within 90-days of startup was not completed as required. The date of startup for A-415 was August 10, 2023, and 90-days after startup was November 8, 2023.

The source test was scheduled for October 18, 2023. While the test was being performed, the plant experienced an unplanned site-wide power outage caused by the utility provider. As a result, the test had to be stopped and could not be completed that day and could not be rescheduled prior to November 8, 2023.

Root Cause: The unplanned power outage resulted in the inability to complete the source test as scheduled. In addition, the testing contractor was unavailable to complete the test prior to November 8, 2023.

Corrective Action: 1. A 90-day extension to complete the source test was submitted to the BAAQMD Permit Engineer on October

Page 2  
Mr. Jeff Gove  
BAAQMD

- 26, 2023, and to Compliance and Enforcement on November 7, 2023.
2. Source test has been tentatively scheduled for January 11, 2024.

If you have any questions, please contact Paula Alba Green ([paula.albagreen@corteva.com](mailto:paula.albagreen@corteva.com)).  
I certify that the above information is true, accurate, and complete to the best of my information and belief.

Sincerely,



James Lipscomb  
Pittsburg Site Director  
Corteva Agriscience

Attachment: 10-Day Initial Notification



November 16<sup>th</sup>, 2023

**DELIVERED BY EMAIL:** [Compliance@BAAQMD.gov](mailto:Compliance@BAAQMD.gov)  
cc: [bsiemens@baaqmd.gov](mailto:bsiemens@baaqmd.gov)

Jeff Gove  
Director of Enforcement  
Bay Area Air Quality Management District  
375 Beale Street, Suite 600  
San Francisco, CA 94105

**RE: Major Facility Permit Non-Compliance Report, 10-Day Notification  
Corteva Agriscience – Pittsburg Operations, Pittsburg, California  
Facility Number A0031  
Plant Number 24380**

Description of Non-Compliance referencing Permit Condition Number

1. Source Number: A-415 (H-320 A/B)
2. Permit Condition Number: Part 9 of Condition #5148 (Authority to Construct for AN 31900)
3. Describe Non-Compliance: 

In accordance with Part 9 of Condition 5148 of the new conditions issued by BAAQMD (Authority to Construct for AN 31900) on July 24, 2023, an initial source test within 90-days of startup was required. The date of startup for A-415 was August 10, 2023. The source test was not performed by the required date of November 8, 2023.

On the day the test was being performed, the plant experienced an unplanned site-wide power outage. This resulted in a gas release that required site personnel to shelter in-place and therefore, the test had to be stopped. Corteva did not have sufficient time to schedule the source testing contractor to perform the test by November 8, 2023.

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4. Submitted By: Paula Alba Green ([paula.albagreen@corteva.com](mailto:paula.albagreen@corteva.com))
5. Discovery Date: November 8<sup>th</sup>, 2023