



Corteva Agriscience  
901 Loveridge Road  
Pittsburg, CA 94565

June 23, 2021

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

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

TV Tracking #: 241

1.  RECEIVED IN ENFORCEMENT: 06/23/2021

**RE: TITLE V MONITORING REPORT  
Corteva Agriscience – Pittsburg Operations, Pittsburg, California (Corteva)  
Facility Number A0031  
Plant Number 24380**

**Reporting Period: December 1, 2020 – May 31, 2021**

Please find enclosed the Title V Monitoring Report for Corteva 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 8 items that had been reported during the period (10-Day Notices attached for reference).

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 Scott Sechler at [scott.sechler@corteva.com](mailto:scott.sechler@corteva.com).

Sincerely,

Evaristo Bernardes  
Pittsburg Site Director  
Corteva Agriscience

Attachment: 10-Day Notices



May 28, 2021

**DELIVERED BY EMAIL: Compliance@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-1011 (Auxiliary Boiler)
  
2. Permit Condition Number: 40 CFR 60, Subpart A – General Provisions  
40 CFR 60, Subpart Db – Industrial-Commercial-Institutional Steam  
Generating Units  
BAAQMD, Regulation 1 – General Provisions and Definitions  
BAAQMD, Regulation 2, Rule 6 – Permits, Major Facility Review  
BAAQMD, Regulation 10-4 – Subpart Db  
BAAQMD, Permit Condition #19356, Part 15 - Recordkeeping  
BAAQMD, Manual of Procedures, Section 5.2  
Title V Permit, Standard Conditions I.E – Records  
Title V Permit, Standard Conditions, I.F – Monitoring Reports

3. Describe Non-Compliance:

a. Recordkeeping Requirements

The required records specified by 40 CFR 60.7(f), 40 CFR 60.49b(g), 40 CFR 60.49b(o), BAAQMD Reg 2-6-501, Title V Permit Standard Condition I.E.1, and Permit Condition #19356, Part 15, were not available during the 2-year and 5-year recordkeeping periods.

b. CO CEM Drift Adjustments

The Auxiliary Boiler CO CEMS was not adjusted when the drift exceeded 5% and 8% of span respectively for the low and high spans as specified by Regulation 1-522.6 and the Manual of Procedures Section 5.2 (adjust when drift exceeds 10% of emissions standard). Instead, adjustments were made when the drift exceeded 10% of span.

c. Late Reporting

The Title V Deviation notification required by Title V Permit Standard Condition I.F was not submitted within 10 days of discovery.

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4. Submitted By:

Scott Sechler (scott.sechler@corteva.com)

5. Discovery Date:

May 4, 2021

May 28, 2021

**DELIVERED BY EMAIL: Compliance@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:           | AFTF:<br>S-693, AFTF Distillation System<br>S-694, Reaction/HCl Absorption System<br>A-195 (B-615) Scrubber  |
| <hr/>                       |  |
| 2. Permit Condition Number: | 40 CFR 63, Subpart FFFF – Miscellaneous Organic Chemical Manufacturing National Emission Standard for Hazardous Air Pollutants (MON)<br>Title V Permit, Standard Condition I.F – Monitoring Reports  |
| <hr/>                       |  |
| 3. Describe Non-Compliance: | 40 CFR 63, Subpart FFF 63.2450(k)(3) à 40 CFR 63, Subpart SS 63.994(c)(1)(i), 40 CFR 63, Subpart FFF 63.2520(c): Missed analysis of daily caustic grab sample as specified by July 15, 2015 Precompliance Report;<br>Title V Permit Standard Condition I.F: Title V deviation report not submitted in a timely manner. |
| <hr/>                       |  |
| 4. Submitted By:            | Scott Sechler (scott.sechler@corteva.com)  |
| <hr/>                       |  |
| 5. Discovery Date:          | May 19, 2021   |
| <hr/>                       |  |

May 28, 2021

**DELIVERED BY EMAIL: Compliance@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: Main/Aux HCl Production control device, B-12 (A-199) which abates:
  - S-4, HCl Rail Tank Car Loading
  - S-434, Manufacturing Services Facility
  - S-576, HCl Storage Tank, T-122
  - S-620, HCl Tank Loading OperationHCl Dock Storage Vent Scrubber, B-607 which abates:
  - S-135, HCl Storage Tank T606A
  - S-136, HCl Storage Tank T606B
  - S-137, HCl Storage Tank T606C
  - S-138, HCl Storage Tank T606D
  - S-139, HCl Storage Tank T606EHCl Dock Storage Vent Scrubber, B-480 (A-165) which abates:
  - S-620 HCl Self-loader Truck Rack

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2. Permit Condition Number: 40 CFR, Part 63, Subpart NNNNN - National Emission Standards for Hazardous Air Pollutants: Hydrochloric Acid Production

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3. Describe Non-Compliance: The Site-Specific Monitoring Plan does not meet the following requirements:
  - 40 CFR 63.9005(c)(6): Plan does not define out-of-control periods.
  - 40 CFR 63.9005(d)(3)-(5): Plan does not contain continuous monitoring system (CMS) performance evaluation procedures and

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acceptance criteria (e.g., calibrations), ongoing O&M procedures, and ongoing data quality assurance procedures.

40 CFR 63.9005(d)(4) and 63.9005(d)(5): Plan not updated to reflect October 13, 2020 updates for changes to referenced citations in General Provisions.

40 CFR 63.9025(a)(3): Plan does not define valid data.

40 CFR 63.9025(a)(6): Plan does not document how results for each calibration are recorded.

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4. Submitted By:

Scott Sechler (scott.sechler@corteva.com)

5. Discovery Date:

May 19, 2021



May 28, 2021

**DELIVERED BY EMAIL: Compliance@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-336, Manufacturing Services Thermal Oxidizer;  
S-389, Sym-Tet Thermal Oxidizer, R-501

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2. Permit Condition Number: 40 CFR, Part 63, Subpart A - Source Categories, General Provisions of MACT Standards  
40 CFR, Part 63, Subpart EEE - Hazardous Waste Combustor MACT

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3. Describe Non-Compliance: Reporting requirements for sources with continuous monitoring systems (CMS) were not in compliance with 40 CFR 63.10(e)(3)(vi)(G), 40 CFR 63, Subpart EEE, Table 1: Incorrect date of the latest CMS certification or audit on Excess Emissions and Monitoring Systems Performance Reports submitted in July 2016, January 2017, July 2017, July 2018, January 2020, July 2020, and January 2021.

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4. Submitted By: Scott Sechler (scott.sechler@corteva.com)

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5. Discovery Date: May 24, 2021

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May 28, 2021

**DELIVERED BY EMAIL: Compliance@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-336, Manufacturing Services Thermal Oxidizer;  
S-389, Sym-Tet Thermal Oxidizer, R-501

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2. Permit Condition Number: 40 CFR, Part 63, Subpart EEE - Hazardous Waste Combustor MACT

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3. Describe Non-Compliance: 40 CFR 63, Subpart EEE, Appendix – Quality Assurance Procedures for Continuous Monitoring Systems:  
Section 3.2.2: QA Plan for CMS (CMSPEP) does not include the requirement to conduct an Interference Response Test whenever an Absolute Calibration Audit (ACA) or Relative Accuracy Test Audit (RATA) is conducted as specified by Section 5.3.  
Section 5.3: The required Interference Response Test was not conducted whenever ACAs were conducted.

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4. Submitted By: Scott Sechler (scott.sechler@corteva.com)

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5. Discovery Date: May 24, 2021

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May 28, 2021

**DELIVERED BY EMAIL: Compliance@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:           | <u>Corteva Agriscience – Pittsburg Operations, Site-Wide Applicability</u>  |
| 2. Permit Condition Number: | <u>BAAQMD, Regulation 11, Rule 2 - Hazardous Pollutants – Asbestos Demolition, Renovation and Manufacturing<br/>40 CFR 61, Subpart M – National Emission Standards for Hazardous Air Pollutants: Asbestos</u> |
| 3. Describe Non-Compliance: | <u>Notifications, reports and records required by Regulation 11, Rule 2 and 40 CFR 61, Subpart M, as applicable, are not maintained onsite.</u>   |
| 4. Submitted By:            | <u>Scott Sechler (scott.sechler@corteva.com)</u>  |
| 5. Discovery Date:          | <u>May 24, 2021</u>   |



March 10, 2021

**DELIVERED BY EMAIL: Compliance@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**

From: Corteva Agriscience – Pittsburg Operations  
901 Loveridge Road  
Pittsburg, CA 94565

Description of Non-Compliance referencing Permit Condition Number

1. Source Number: S-446
2. Permit Condition Number: MON-MACT: 40 CFR Part 63 Subpart FFFF, Section 63.2450(a)(1)
3. Describe Non-Compliance: Four malfunction events resulting in excess emissions occurred. The SSM plan was followed; therefore, these events are deviations, but not violations of the MON rule. Excess emissions from these 4 events occurred for 0.14 hours (8.15 minutes)
4. Submitted By: *Scott Sechler*  
Scott Sechler
5. Discovery Date: 2/28/2021

# Major Facility Permit Non-Compliance Report

3/18/2021

To: Director of Enforcement  
Mail Stop DV1  
BAAQMD

From: Corteva Agriscience – Pittsburg Operations  
901 Loveridge Road  
Pittsburg, CA 94565

Submit to BAAQMD within 10 days of discovery. Email to [Compliance@BAAQMD.gov](mailto:Compliance@BAAQMD.gov)

Describe Non-Compliance referencing Permit Condition Number

1. Source Number: S-1011, Auxiliary Boiler
2. Permit Condition Number: 40 CFR 60, Subpart A – General Provisions  
40 CFR 60, Subpart Db – NSPS for Industrial-Commercial-Institutional Steam Generating Units  
40 CFR 60, Appendix F – Quality Assurance Procedures  
BAAQMD, Regulation 1 – General Provisions & Definitions  
BAAQMD, Regulation 10 – Standards of Performance for New Stationary Sources  
BAAQMD, Manual of Procedures – Vol V, Continuous Emission Monitoring  
BAAQMD Permit Condition #19356, Part 14.c – Compliance with 40 CFR 60, Appendix F  
Title V Permit, Standard Conditions F – Monitoring Reports
3. Describe Non-Compliance:
  - a. Semi-Annual Reporting 40 CFR 60, Subpart Db, 60.49b(i); 40 CFR 60, Subpart A, 60.7(c); and BAAQMD Regulation 10-4 requires submittal of semiannual excess emission and continuous emission monitoring system performance reports for the NO<sub>x</sub> and O<sub>2</sub> CEMS installed on S-1011. The period of missed reporting was from March 4, 2010 through June 30, 2020.
  - b. Quality Assurance Audits 40 CFR 60, Subpart Db, 60.48b(e); 40 CFR 60, Subpart A, 60.13(a); 40 CFR 60, Appendix F, Procedure 1, Section 5.1.2; and BAAQMD Permit Condition #19356, Part 14.c require that Cylinder Gas Audits (CGAs) be conducted on a quarterly basis for three quarters of each calendar year for the NO<sub>x</sub> and O<sub>2</sub>

CEMS installed on S-1011. The period of missed CGAs was from March 2010 through September 2020. In addition, required annual RATAs were not conducted in 2013 and 2015.

c. Replacement NO<sub>x</sub>  
CEMS: RATA  
Requirements

A replacement NO<sub>x</sub> CEMS was installed in August 2020. A RATA was conducted to meet the performance evaluation requirements of 40 CFR 60, Subpart A, 60.13(c). However, BAAQMD was not notified 30 days prior to the RATA as required by 40 CFR 60, Subpart A, 60.7(a)(5), nor were the RATA results submitted electronically to EPA's CDX within 90 days of completion of the RATA as required by 40 CFR 60, Subpart Db, 60.46b(j)(14).

d. Replacement NO<sub>x</sub>  
CEMS: Plans and  
Specifications Submittal

A replacement NO<sub>x</sub> CEMS was installed in August 2020. Plans and specifications were not submitted to BAAQMD for prior approval in accordance with BAAQMD Regulation 1-522.1 and the BAAQMD Manual of Procedures, Volume V, Section 3.

e. Recordkeeping  
Requirements

NO<sub>x</sub>/O<sub>2</sub> CEMS and boiler operation records were not maintained in a permanent form suitable for inspection in accordance with 40 CFR 60, Subpart A, 60.7(f) for the period from March 2010 through December 2020.

f. Title V Permit: Late  
Reporting

As required by Title V Permit, Standard Condition F, reporting in writing of these non-compliance items was not submitted within 10 days of discovery.

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4. Submitted By:

Scott Sechler (scott.sechler@corteva.com)

5. Date:

3/18/2021