



Corteva Agriscience
901 Loveridge Road
Pittsburg, CA 94565

December 16, 2022

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

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

TV Tracking #: 618

1. RECEIVED IN 12/16/2022
ENFORCEMENT:

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

Reporting Period: June 1, 2022 – November 30, 2022

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 items that had been reported during the period (30-Day Reports and 10-Day Notices attached as 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 Suzanne Chaewsky at suzanne.chaewsky@corteva.com.

Sincerely,

James Lipscomb
Pittsburg Site Director
Corteva Agriscience

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

August 19, 2022

DELIVERED BY EMAIL: Compliance@BAAQMD.gov
cc: Betty Kwan

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-32102 Fugitive Sources (Sym-Tet Plant)
Permit Condition Number:	BAAQMD Regulation 8 Organic Compounds, Rule 18 Equipment Leaks
Describe Non-Compliance:	A valve leak discovered on 7/19/22 to be in excess of 100 ppm was not minimized within 24 hours.
Root Cause:	To access the valve for the first attempt at repair, scaffolding had to be erected because the valve is located 10 feet above grade. Personnel needed to build the scaffolding were unavailable until later in the day on 7/20/22 which delayed the ability to make the first attempt at repair until 6:14 am on 7/21/22, 45 hours after discovery. The leak was repaired and verified as no longer leaking on 7/23/22, within the 7 days as required by the rule.
Corrective Action:	The following corrective action has been identified: <ul style="list-style-type: none">• Conduct refresher training for process and maintenance personnel in the Sym-Tet plant to ensure they

understand the requirement to address fugitive leaks
within 24 hours of discovery.

If you have any questions, please contact Suzanne Chaewsky at 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 "Evaristo Bernardes". The signature is written in a cursive, flowing style.

Evaristo Bernardes
Pittsburg Site Director
Corteva Agriscience

Attachment: 10-Day Initial Notification



July 27, 2022

DELIVERED BY EMAIL: Compliance@BAAQMD.gov
Cc: Betty Kwan

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-32102 Fugitive Sources (Sym-Tet Plant) |
| 2. Permit Condition Number: | BAAQMD Regulation 8 Organic Compounds, Rule 18 Equipment Leaks |
| 3. Describe Non-Compliance: | A valve leak discovered to be in excess of 100 ppm was not minimized within 24 hours and it remained in service until its repair four days later. |
| 4. Submitted By: | Suzanne Chaewsky |
| 5. Discovery Date: | July 21, 2022 |

August 19, 2022

DELIVERED BY EMAIL: Compliance@BAAQMD.gov

**cc: Betty Kwan
Kevin Cordes**

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-30 (T-608B)

Permit Condition Number: Condition 11276

40 CFR Part 63, Subpart FFFF - Miscellaneous Organic Chemical
Manufacturing (MON MACT)

Describe Non-Compliance: Condition 11276 states that S-30 is to be abated by a Thermal Oxidizer (either S-336 or S-389) whenever non-exempt materials are being loaded or stored. S-30 was not abated per condition 11276.1 for the following periods:

- 6/10/19 12:30 PM - 6/10/19 2:10 PM
- 6/28/19 8:10 AM - 6/28/19 12:50 PM
- 1/20/21 5:50 PM - 1/20/21 6:00 PM
- 5/20/21 2:00 PM - 5/20/21 6:10 PM
- 2/18/22 10:00 AM – 2/18/22 10:20 AM
- 3/30/22 3:10 PM – 3/30/22 3:40 PM
- 3/31/22 4:20 AM – 3/31/22 5:10 AM
- 4/16/22 7:40 PM – 4/16/22 7:50 PM

Root Cause

The two Thermal Oxidizer operating units relied on verbal communication between the operations staff to share information

about whether the unit was available to take feeds. Automating this communication (control system to control system) will help ensure each unit is aware of the other unit's capability.

Corrective Action

Automation of the communication between the control systems regarding their ability to take feeds will be put into place.

If you have any questions, please contact Scott Sechler at scott.sechler@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 "Bernardes", written in a cursive style.

Evaristo Bernardes
Pittsburg Site Director
Corteva Agriscience

Attachment: 10-Day Initial Notification



August 4, 2022

DELIVERED BY EMAIL: Compliance@BAAQMD.gov

**cc: Betty Kwan
Kevin Cordes**

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-30 (T-608B) |
| 2. | Permit Condition Number: | Condition 11267 (originally submitted), 11276 (corrected)

40 CFR Part 63, Subpart FFFF - Miscellaneous Organic Chemical Manufacturing (MON MACT) |
| 3. | Describe Non-Compliance: | S-30 was not abated per condition 11267.1 for the following periods: <ul style="list-style-type: none">• 6/10/19 12:30 PM - 6/10/19 2:10 PM• 6/28/19 8:10 AM - 6/28/19 12:50 PM• 1/20/21 5:50 PM - 1/20/21 6:00 PM• 5/20/21 2:00 PM - 5/20/21 6:10 PM• 2/18/22 10:00 AM – 2/18/22 10:20 AM• 3/30/22 3:10 PM – 3/30/22 3:40 PM• 3/31/22 4:20 AM – 3/31/22 5:10 AM• 4/16/22 7:40 PM – 4/16/22 7:50 PM |
| 4. | Submitted By: | Scott Sechler |
| 5. | Discovery Date: | July 25, 2022 |



August 19, 2022

DELIVERED BY EMAIL: Compliance@BAAQMD.gov
cc: Betty Kwan

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-174 Gasoline Dispensing Facility
Permit Condition Number:	Condition 20666.2 Title V Permit Condition 20666.3 BAAQMD Permit to Operate #A0031
Describe Non-Compliance:	Test results for performance tests performed on the gasoline dispensing facility on 6/20/2022 were not submitted to the air district within 15-days as required by Condition 20666.2 of the facility's Title V permit or within 30-days per Condition 20666.3 of the Permit to Operate. Test results were inadvertently submitted to an incorrect email at the air district by the tank contractor on 7/19/2022. They were resubmitted to the correct air district email address on 7/20/2022.
Root Cause:	The cause of the late submission of the performance test results to the air district within the 15-day period was that the facility did not recognize the independent timelines of its Title V Permit and Permit to Operate. The cause of the late submittal by one day was due to contractor error.

Corrective Action:

The following corrective actions have been identified:

- Revise the procedure for completing the performance tests to include the 15-day submittal requirement.
- Revise the procedure to include site follow-up with the tank contractor to ensure test results are submitted within the required time frame and to the correct email address.
- Identify and correct the inconsistency between the Title V and air district permits with the next round of proposed revisions to the Title V permit.

If you have any questions, please contact Suzanne Chaewsky at 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 "Bernardes". The signature is written in a cursive, flowing style.

Evaristo Bernardes
Pittsburg Site Director
Corteva Agriscience

Attachment: 10-Day Initial Notification

July 27, 2022

DELIVERED BY EMAIL: Compliance@BAAQMD.gov
Cc: Betty Kwan

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-174 Gasoline Dispensing Facility |
| <hr/> | |
| 2. Permit Condition Number: | Condition 20666.2 Title V Permit
Condition 20666.3 BAAQMD Permit to Operate #A0031 |
| <hr/> | |
| 3. Describe Non-Compliance: | Test results for performance tests performed on the gasoline dispensing facility on 6/20/2022 were not submitted to the air district within 15-days as required by Condition 20666.2 of the facility's Title V permit or within 30-days per Condition 20666.3 of the Permit to Operate. Test results were inadvertently submitted to an incorrect email at the air district by the tank contractor on 7/19/2022. They were resubmitted to the correct air district email address on 7/20/2022. |
| <hr/> | |
| 4. Submitted By: | Suzanne Chaewsky |
| <hr/> | |
| 5. Discovery Date: | July 27, 2022 |
| <hr/> | |



September 7, 2022

DELIVERED BY EMAIL: Compliance@BAAQMD.gov
cc: Betty Kwan
Kevin Cordes

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-446 (B-607)
Permit Condition Number:	40 CFR Part 63, Subpart NNNNN – Hydrochloric Acid Production (HCL MACT) Report the operating parameter for pH in the NOCS 63.9045(a), 63.9045(g), Table 7 of HCL MACT, 63.9(h)(2)(i)(C) Report which compliance method is being followed 63.9045(a), Table 7 of HCL MACT, 63.9(h)(2)(i)(F) Establish the minimum and maximum pH operating parameter in the Design evaluation; 63.9020(e)(3)
Describe Non-Compliance:	The maximum operating pH for scrubber B-607 was not established in the design evaluation or reported in the Notification of Compliance Report. In addition, the compliance method demonstrated in the design evaluation was not reported correctly in the Notification of compliance report.
Root Cause:	Although the rule requires that a maximum pH be established as an operating parameter for the scrubber, the max pH would not be a good indicator of scrubber performance for this scrubber. Since Max pH is not an operating parameter that would indicate the scrubber is

operating properly, a maximum pH limit was not established in the design evaluation and was not implemented as a required monitoring parameter.

Corrective Action:

Update the Design evaluation to establish pH as an operating parameter and to include a minimum and maximum pH limit as required by the rule. Update the NOCS report to include the appropriate scrubber operating parameters and compliance limit that is being demonstrated. Evaluate if a waiver request or alternative monitoring request should be submitted for a parameter limit that is a good indicator of scrubber performance to replace the max pH limit.

If you have any questions, please contact Scott Sechler at scott.sechler@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 "Bernardes", written in a cursive style.

Evaristo Bernardes
Pittsburg Site Director
Corteva Agriscience

Attachment: 10-Day Initial Notification



August 16, 2022

DELIVERED BY EMAIL: Compliance@BAAQMD.gov
cc: Betty Kwan
Kevin Cordes

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>S-446 (B-607)</u> |
| 2. | Permit Condition Number: | 40 CFR Part 63, Subpart NNNNN – Hydrochloric Acid Production (HCL MACT)

Not reporting the operating parameter for pH in the NOCS 63.9045(a), 63.9045(g), Table 7 of HCL MACT, 63.9(h)(2)(i)(C)

Error in reporting which compliance method is being followed 63.9045(a), Table 7 of HCL MACT, 63.9(h)(2)(i)(F)

Not establishing the minimum and maximum pH operating parameter in the Design evaluation; 63.9020(e)(3) |
| 3. | Describe Non-Compliance: | <u>Maximum operating pH of scrubber, B-607, was not established or reported.</u> |
| 4. | Submitted By: | <u>Scott Sechler</u> |
| 5. | Discovery Date: | <u>August 8, 2022</u> |



September 7, 2022

DELIVERED BY EMAIL: Compliance@BAAQMD.gov
cc: Betty Kwan
Kevin Cordes

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-4 (HCl Rail Tank Car Loading)
Permit Condition Number:	40 CFR Part 63, Subpart NNNNN – Hydrochloric Acid Production (HCl MACT) Identify each emission point in the Notification of Compliance Report. Table 7 of 40CFR63, Subpart NNNNN → §63.9(h)(1) and (h)(2)(F) §63.9000(a) → Table 1, condition 4 or 40CFR63, Subpart NNNNN
Describe Non-Compliance:	The Central Tank Car Rack was incorrectly identified as being exempt from the HCL MACT rule during the initial implementation of the HCL MACT. In addition, the HCL LDAR plan was not followed for the Central Tank Car Rack due to the missed applicability.
Root Cause:	The Central Tank Car Rack can be abated by a Halogen Acid Furnace (HAF) which is subject to the Hazardous Waste Combustor MACT in 40CFR63, Subpart EEE. The transfer rack can also vent to scrubber, B-12 which is an HCL MACT control device. While venting to the HAF, the transfer operation would be exempt from the HCL MACT per

§63.9000(c)(4). When the central tank car rack is vented to the B-12 scrubber system, the HCL MACT is applicable and the transfer operation must be included in the HCL MACT NOCS and the LDAR plan must be followed.

Corrective Action:

Update the HCL MACT documentation to include venting to the scrubber for the HCL Tank Car Loading operation. This documentation has been completed and was submitted to the BAAQMD on 8/19/22.

Implement the LDAR plan for the transfer operation.

If you have any questions, please contact Scott Sechler at scott.sechler@corteva.com.

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

Sincerely,



Evaristo Bernardes
Pittsburg Site Director
Corteva Agriscience

Attachment: 10-Day Initial Notification



August 16, 2022

DELIVERED BY EMAIL: Compliance@BAAQMD.gov
cc: Betty Kwan
Kevin Cordes

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-4 (HCl Rail Tank Car Loading)
2. Permit Condition Number: 40 CFR Part 63, Subpart NNNNN – Hydrochloric Acid Production (HCl MACT)

Not submitting Initial Notification within 120 days after source becomes subject to HCl MACT, 63.9045(b)
3. Describe Non-Compliance: The Central Tank Car Rack was incorrectly identified as exempt during the original implementation of the HCl MACT.
4. Submitted By: Scott Sechler
5. Discovery Date: August 11, 2022



September 15, 2022

DELIVERED BY EMAIL: Compliance@BAAQMD.gov

**cc: Betty Kwan
Kevin Cordes**

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-30, S-55, S-151, S-429, S-431, S-432, S-458, S-496, S-506, S-607, S-662, S-663, S-664, S-680, & S-701

Permit Condition Number: BAAQMD Reg 8 Rule 5 Section 404

Describe Non-Compliance: While monitoring was conducted, reports for compliance with 8-5-404 for 4Q21, 1Q22, and 2Q22 were not submitted on time.

Root Cause: The quarterly submission associated with Reg 8 Rule 5 Section 404 was not identified in the department's compliance tracking system.

Corrective Action: The reports for 4Q21, 1Q22, and 2Q22, along with the 3Q22 report, were submitted to the BAAQMD on August 25, 2022.

The quarterly submission associated with Reg 8 Rule 5 Section 404 will be added to the compliance tracking system so that a task is assigned to the Air Specialist(s) to complete the submission by the end of each quarter.

If you have any questions, please contact Scott Sechler at scott.sechler@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 "Bernardes". The signature is written in a cursive style with a large initial letter.

Evaristo Bernardes
Pittsburg Site Director
Corteva Agriscience

Attachment: 10-Day Initial Notification



August 25, 2022

DELIVERED BY EMAIL: Compliance@BAAQMD.gov

**cc: Betty Kwan
Kevin Cordes**

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-30, S-55, S-151, S-429, S-431, S-432, S-458, S-496, S-506, S-607, S-662, S-663, S-664, S-680, & S-701

2. Permit Condition Number: BAAQMD Reg 8 Rule 5 Section 404

3. Describe Non-Compliance: While monitoring was conducted, reports for compliance with 8-5-404 for 4Q2021, 1Q2022, and 2Q2022 were not submitted on time.

4. Submitted By: Scott Sechler

5. Discovery Date: August 18, 2022



September 16, 2022

DELIVERED BY EMAIL: Compliance@BAAQMD.gov

**cc: Betty Kwan
Kevin Cordes**

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-30 (T-608B)
Permit Condition Number:	Condition 11276 40 CFR Part 63, Subpart FFFF - Miscellaneous Organic Chemical Manufacturing (MON MACT)
Describe Non-Compliance:	Condition 11276 states that S-30 is to be abated by a Thermal Oxidizer (either S-336 or S-389) whenever non-exempt materials are being loaded or stored. S-30 was not abated per condition 11276.1 on August 17, 2022 for 23 minutes. Per MON-MACT 63.2470(a), A group 1 storage tank must comply with the emission limits in Table 4.
Root Cause	A short-term instrument failure caused S-30's control logic to move the system out of the process control step to receive feeds so that S-30 was no longer available to receive potential emissions from the storage tank.
Corrective Action	Predictive Preventive Maintenance (PPM) will be increased for the instrument.

If you have any questions, please contact Scott Sechler at scott.sechler@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 "Bernardes", written in a cursive style.

Evaristo Bernardes
Pittsburg Site Director
Corteva Agriscience

Attachment: 10-Day Initial Notification



August 25, 2022

DELIVERED BY EMAIL: Compliance@BAAQMD.gov

**cc: Betty Kwan
Kevin Cordes**

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-30 (T-608B) |
| 2. Permit Condition Number: | Condition 11267
40 CFR Part 63, Subpart FFFF - Miscellaneous Organic Chemical Manufacturing (MON MACT) |
| 3. Describe Non-Compliance: | S-30 was not abated per condition 11267.1 |
| 4. Submitted By: | Scott Sechler |
| 5. Discovery Date: | August 17, 2022 |



September 16, 2022

DELIVERED BY EMAIL: Compliance@BAAQMD.gov
cc: Betty Kwan
Kevin Cordes

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-694 Reaction/HCl Absorber System

Permit Condition Number: 40CFR63.2450(k)→40 CFR 63.999(c)(6)(i)(B)

Describe Non-Compliance: A flow monitoring Instrument associated with a MON control device (scrubber X-610) was reading at its maximum value (i.e., pegged) because of high voltage to the instrument.

A recent pump changeout caused a high voltage alarm to activate to the MON control device flowmeter. The high voltage resulted in the flowmeter pegging out.

The “pegged” flowmeter continued to measure, with a recorded maximum instrument reading of 101.5 gpm.

Upon further evaluation of the flowmeter, it was determined that the instrument was working properly, although reading at the higher flowrate. The voltage to the flowmeter was measured to be 5.2, which is below 5.65 voltage which would indicate an instrument failure. The MON rule does not allow the use of monitoring data during periods of malfunction to calculate the daily average. As there was insufficient monitoring data available when excluding the pegged-out readings on the flow meter, the daily average could not be calculated for the period from August 1 to August 9, 2022.

Although the daily average flow rate for scrubber X-610 could not be calculated due to insufficient monitoring data, this scrubber is in series with B-615 scrubber which is a permitted control device (A-194) and is part of the MON control system.

Root Cause:

The site was not aware that a pegged flowmeter would result in monitoring data that could not be included in the daily average calculation to demonstrate that the scrubber was operating properly.

Corrective Action(s):

The following corrective actions were identified:

- Update the MON-MACT training to include an explanation on what constitutes insufficient monitoring data related to instrumentation used to demonstrate compliance with the MON, including a “pegged” instrument.
 - Replace the flowmeter so that it can measure higher flow rates associated with the scrubber without pegging out the instrument; therefore, the device will continue providing valid data for calculating the daily average.
-

If you have any questions, please contact Suzanne Chaewsky at suzanne.chaewsky@corteva.com.

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

Sincerely,



Evaristo Bernardes
Pittsburg Site Director
Corteva Agriscience

Attachment: 10-Day Initial Notification



August 26, 2022

DELIVERED BY EMAIL: Compliance@BAAQMD.gov
cc: Betty Kwan

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-694 Reaction/HCl Absorber System

2. Permit Condition Number: 40CFR63.2450(k)→40 CFR 63.999(c)(6)(i)(B)

3. Describe Non-Compliance: A flow monitoring Instrument associated with a MON control device was reading out of range resulting in insufficient monitoring data to calculate the daily average value to determine compliance for 10 days.

No excess emissions resulted from this non-compliance because the affected control device is located upstream from a permitted control device (A-194).

4. Submitted By: Suzanne Chaewsky

5. Discovery Date: August 18, 2022



August 31, 2022

DELIVERED BY EMAIL: Compliance@BAAQMD.gov
cc: Betty Kwan

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:	Major Facility Review Permit No. A0031
Permit Condition Number:	Section I - Standard Conditions, Paragraph K 40 CFR Part 68 - Chemical Accident Prevention Provisions (RMP)
Describe Non-Compliance:	One employee, who started operating a new process approximately four months ago, missed one element of the required training specified in §68.69 of the RMP rule. Corteva's PSM/RMP initial training certification process is used to ensure the required RMP training has been received, understood, and documented. It was discovered that documentation showing completion of the required training on Safety Systems was not available for one employee. Upon further review, it was determined that the training had not been completed by the employee before he/she began operating a new process. The employee completed the required training on 08/01/22. All other training requirements were met.

Section I - Standard Conditions, Paragraph K, of the facility's Title V Permit, states that the permit holder shall also certify compliance with the requirements of Part 68 as part of the annual compliance certification. Additionally, per 40 CFR 68.71(a)(1), each employee presently involved in operating a process, and each employee before being involved in operating a newly assigned process, shall be trained on the elements indicated in 68.69. Per 40 CFR 68.71(c) The owner or operator shall ascertain that each employee involved in operating a process has received and understood the training required by this paragraph.

No excess emissions resulted from this non-compliance.

Root Cause:

The root causes were identified as follows:

- The supervisor responsible for signing the internal certification and releasing the employee for independent work was not aware that the employee had one outstanding class to complete.
- The supervisor was not aware of the internal certification requirement and its use to demonstrate compliance with the RMP training requirements.
- The supervisor had not been trained on Corteva's certification process and consequently was not aware of the existence of a certification process guidance document.
- The facility's certification process guidance document did not explicitly specify the order of activities required for certification nor did it indicate that a signed certification form was required prior to releasing the employee for independent work.

Corrective Action(s):

The following corrective actions were identified:

- The employee completed the required training on 08/01/22.
- Develop and implement a work process for training and communicating the internal certification process to the appropriate department personnel (i.e., supervisor, in-plant trainer, employee, etc.).
- Revise the internal certification process guidance document to specify the order of activities required for internal certification and explicitly state the

requirement for a signed certification form prior to releasing an employee for independent work.

If you have any questions, please contact Suzanne Chaewsky at 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 "Bernardes". The signature is written in a cursive, flowing style with a large initial letter.

Evaristo Bernardes
Pittsburg Site Director
Corteva Agriscience

Attachment: 10-Day Initial Notification

August 10, 2022

DELIVERED BY EMAIL: Compliance@BAAQMD.gov
Betty Kwan

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: | Major Facility Review Permit # A0031 |
| <hr/> | |
| 2. Permit Condition Number: | Section I - Standard Conditions, Paragraph K
40 CFR Part 68.71 (a)(1) Initial Training
Chemical Accident Prevention Provisions (RMP) |
| <hr/> | |
| 3. Describe Non-Compliance: | In the course of completing the PSM/RMP initial certification for an employee, it was discovered that the employee had been operating the process for approximately 4 ½ months without having completed one training course required for certification.

No excess emissions resulted from this non-compliance. |
| <hr/> | |
| 4. Submitted By: | Suzanne Chaewsky |
| <hr/> | |
| 5. Discovery Date: | August 4, 2022 |
| <hr/> | |



September 29, 2022

DELIVERED BY EMAIL: Compliance@BAAQMD.gov
cc: Betty Kwan
Kevin Cordes

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-389, Sym-Tet Thermal Oxidizer, R-501
Permit Condition Number:	40 CFR, Part 63, Subpart A - Source Categories, General Provisions of MACT Standards
Describe Non-Compliance:	40 CFR 63, Subpart A, §63.10(e)(3): The Periodic Report for the ST HAF (S-389) submitted in July 2022 did not include the updated monitoring equipment manufacturers and model numbers for two instruments.
Root Cause:	The root cause was determined to be an error made by the initial report preparer to include the required updated information in the Periodic Report.
Corrective Action:	The corrections will be made with the next periodic report.

If you have any questions, please contact Suzanne Chaewsky at 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 "Bernardes". The signature is written in a cursive, flowing style with a large initial letter.

Evaristo Bernardes
Pittsburg Site Director
Corteva Agriscience

Attachment: 10-Day Initial Notification

September 14, 2022

DELIVERED BY EMAIL: Compliance@BAAQMD.gov
Betty Kwan
Kevin Cordes

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-389, Sym-Tet Thermal Oxidizer, R-501
2. Permit Condition Number: 40 CFR, Part 63, Subpart A - Source Categories, General Provisions of MACT Standards
3. Describe Non-Compliance: 40 CFR 63, Subpart A, §63.10(e)(3): The Periodic Report for the ST HAF (S-389) submitted in July 2022 did not include the updated monitoring equipment manufacturers and model numbers for two instruments.
4. Submitted By: Suzanne Chaewsky (suzanne.chaewsky@corteva.com)
5. Discovery Date: September 8, 2022



November 17, 2022

DELIVERED BY EMAIL: Compliance@BAAQMD.gov
cc: Betty Kwan
Kevin Cordes

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:	<u>S-174 Service Station G5131 (Gasoline Dispensing Island)</u>
Permit Condition Number:	<u>Condition 20666 Part 1 (BAAQMD Permit to Operate)</u>
Describe Non-Compliance:	CARB procedure TP-201.3 requires that a Static Pressure Performance test be performed at least once in each 12-month period. In 2021, this test was performed on 6/4/21 while in 2022, this test was performed on 6/20/22, 16 days after the 12-month period. <hr/>
Root Cause:	The root cause for the non-compliance was determined to be an inadvertent scheduling error made by Corteva site staff. <hr/>
Corrective Action:	As stated above, the required test was performed on 6/20/22. The future testing schedule was reviewed to ensure permit compliance. <hr/>

If you have any questions, please contact Suzanne Chaewsky at 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



November 1, 2022

DELIVERED BY EMAIL: Compliance@BAAQMD.gov

**Cc: Betty Kwan
Kevin Cordes
Mariel Adler-McAllister**

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-174 Service Station G5131 (Gasoline Dispensing Island)
2. Permit Condition Number: Condition 20666 Part 1 (BAAQMD Permit to Operate)
3. Describe Non-Compliance: CARB procedure TP-201.3 requires that a Static Pressure Performance test be performed at least once in each 12-month period. In 2021, this test was performed on 6/4/21 while in 2022, this test was performed on 6/20/22, 16 days after the 12-month period.
4. Submitted By: Suzanne Chaewsky
5. Discovery Date: October 25, 2022



November 18, 2022

DELIVERED BY EMAIL: Compliance@BAAQMD.gov
cc: Betty Kwan
Kevin Cordes

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-446 Sym-Tet Plant (Chlorpyridines)
Permit Condition Number:	40 CFR Part 63, Subpart FFFF - Miscellaneous Organic Chemical Manufacturing (MON MACT)
Describe Non-Compliance:	<p>Due to a buildup of pressure in T-146 (a continuous process vent in the Beta Distillation process), venting to the ST-HAF was stopped. The backup control device (PSA) was down for planned maintenance; therefore, a bypass event occurred. The event lasted 63 minutes and resulted in emissions of approximately 5.5 pounds of carbon tetrachloride and trace amounts of hexachloroethane and perchloroethylene to the atmosphere.</p> <p>Per MON-MACT 63.2450(a)(1), the Miscellaneous Chemical Manufacturing Process Unit (MCPU) must be in compliance with the emission limits and work practice standards in Table 1 for group 1 continuous process vents.</p>

Root Cause:

The bypass event resulted from a stuck control valve that is used to equalize levels in some process tanks that vent to the main control device, the ST HAF. As a result of the stuck control valve, the levels in both tanks raised, decreasing the vapor space, and increasing the pressure. Despite troubleshooting efforts by the operators to fix the problem, the increased levels caused the pressure to exceed the control set point which caused the valve to the ST-HAF to close. The back-up control device (PSA) was down for planned maintenance, resulting in excess emissions of carbon tetrachloride and trace organic HAPs to the atmosphere.

The vents were scrubbed by T-90, which is part of the MON control system; however, since the PSA was down for maintenance, the carbon tetrachloride was not controlled by the entire control system (T-90/T-91, T-92, and the PSA).

The carbon tetrachloride emissions were reduced by scrubber B-106/T-124B and T-28 (non-MON approved control devices) prior to venting to the atmosphere.

Corrective Action:

The following corrective actions were identified from the investigation:

1. Operators lowered the liquid level in T-146 to reduce the pressure in the system so that levels became equalized and cleared the stuck valve so that it returned to normal operation
2. Review the control system operation to improve its reliability.

If you have any questions, please contact Suzanne Chaewsky at 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



November 4, 2022

DELIVERED BY EMAIL: Compliance@BAAQMD.gov
cc: Betty Kwan
Kevin Cordes

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:

Due to a buildup of pressure in T-146 (a continuous process vent in the Beta Distillation process), venting to the ST-HAF was stopped. Because the PSA was down for planned maintenance, a bypass event occurred that lasted 63 minutes resulted in emissions of approximately 5.48 pounds of carbon tetrachloride from T-124A.

Per MON-MACT 63.2450(a)(1), the plant must be in compliance with the emission limits and work practice standards in Table 1 and meet the notification, reporting, and recordkeeping requirements.
4. Submitted By: Suzanne Chaewsky
5. Discovery Date: October 27, 2022