



Corteva Agriscience  
901 Loveridge Road  
Pittsburg, CA 94565

June 18, 2024

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

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

TV Tracking #: 922

1.  RECEIVED IN  
ENFORCEMENT: 06/20/2024

**RE: TITLE V MONITORING REPORT**  
**Corteva Agriscience – Pittsburg Operations, Pittsburg, California (Corteva)**  
**Facility Number A0031**  
**Plant Number 24380**  
**Reporting Period: December 1, 2023 – May 31, 2024**

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

January 12, 2024

**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(u)

Describe Non-Compliance: On December 17, 2023, at 23:30 hours, a pinhole leak was discovered on a weld on the overhead vent pipe coming off the B-152 distillation column resulting in unplanned HAP emissions to the atmosphere that are normally recycled within the process.

Based on Corteva's calculations, it was determined that 7 pounds of carbon tetrachloride, 2 pounds of chlorine, and 1 pound of hydrogen chloride were released during the event.

Root Cause: Water intrusion from a steam jacketed pump failure accelerated corrosion in the overhead piping of the B-152 distillation column resulting in the pin hole leak in the pipe.

Corrective Actions:

1. Operations took immediate action to isolate, de-inventory, and purge the distillation column until a leak repair clamp could be safely applied.
2. The leak was stopped at 1800 hours on December 18 when the leak repair clamp was successfully applied.

Page 2  
Mr. Jeff Gove  
BAAQMD

3. Replace the failed pump in accordance with the MON Equipment leak provisions and complete the repair on the pipe.

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 horizontal line extending to the right.

James Lipscomb  
Pittsburg Site Director  
Corteva Agriscience

Attachment: 10-Day Initial Notification



December 22, 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: 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 (Chlorpyridines)
2. Permit Condition Number: 40 CFR Subpart FFFF – Miscellaneous Organic Chemical Manufacturing National Emission Standard for Hazardous Air Pollutants (MON MACT) 63.2450(a)
3. Describe Non-Compliance: 

On December 17, 2023, at 11:30 pm, a pinhole leak was discovered on a weld on the overhead vent pipe coming off the B-152 distillation column. Operations took immediate action to isolate, de-inventory, and purge the distillation column until a leak repair clamp could be safely applied. The leak was stopped at 1800 hours on December 18 when the leak repair clamp was successfully applied.

Based on Corteva’s calculations, it was determined that 7.2 pounds of carbon tetrachloride, 1.7 pounds of chlorine, 0.8 pounds of hydrogen chloride, and 38.8 pounds of nitrogen were released during the event.
4. Submitted By: Suzanne Chaewsky ([suzanne.chaewsky@corteva.com](mailto:suzanne.chaewsky@corteva.com))
5. Discovery Date: December 17, 2023

January 18, 2024

**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 63.2450(e)(3), 40 CFR 63.2450(k)(3), and Table 3 of Subpart FFFF – Miscellaneous Organic Chemical Manufacturing National Emission Standard for Hazardous Air Pollutants (MON MACT). 40 CFR 63.994(c) Subpart SS – National Emission Standards for Closed Vent Systems, Control Devices, Recovery Devices and Routing to Fuel Gas System or a Process.

Describe Non-Compliance: On December 21 at 19:05 and continuing through 07:04 on December 22, 2023, the caustic strength of T-90 scrubber fell below the operating limit of 3.7%.

The T-90 scrubber is in series with the T-91/B-91 (MON control device) and T-28 scrubber (non-MON control device). During the event, the T-91/B-91 and T-28 scrubbers were operating; therefore, emissions were minimized.

Root Cause: The fresh chlorine valve to T-90 scrubber was inadvertently opened, resulting in excess chlorine to the T-90 scrubber.

Corrective Actions: 1. Closed fresh chlorine valve upon discovery.

2. Operators recharged T-90 with caustic at various times until the caustic strength fully recovered as indicated by samples collected at 07:04 on December 22<sup>nd</sup>, 2023.
3. Will update programming code to include additional verification step prior to opening the fresh chlorine valve, effectively adding a second layer of protection before the fresh chlorine valve can be opened.

If you have any questions, please contact Paula Alba Green at [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

February 22, 2024

**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-1011 Auxiliary Boiler
Permit Condition Number:	40 CFR 60, Subpart Db, §60.49b(i)
Describe Non-Compliance:	40 CFR 60, Subpart Db, §60.49b(i) requires that reports are submitted containing daily calibration drifts tests.  Required calibration drift test requirements were not submitted in the compliance report dated January 30, 2024, as required.  On January 24, 2024, during the preparation of the NSPS Db Semiannual Excess Emissions and Monitoring System Performance Report, it was discovered that documentation for the Auxiliary Boiler daily calibration drifts checks on October 20 and 21, 2023, was not readily available due to a loss of communication with the Data Acquisition Handling System (DAHS).
Root Cause	The root cause for not including the calibration data in the compliance report was that the data was temporarily inaccessible due to a loss of communication between the data

collection system and the DAHS resulting from the facility-wide power outage on October 18, 2023.

The loss of communication was caused by a software configuration issue that prevented the automatic restart of the communication after a loss of power.

Corrective Action

1. The software company restored the calibration data.
2. The NSPS Db report was resubmitted on February 15, 2024, to include the calibration data.
3. The software configuration was modified to automatically restart communication after a power outage event.

If you have any questions, please contact Paula Alba Green at [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



February 1, 2024

**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: 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   |
| <hr/> |                          |   |
| 2.    | Permit Condition Number: | 40 CFR 60, Subpart Db, §60.49b(g)(10)<br>40 CFR 60, Subpart A, §60.13(d)(1)<br>BAAQMD Regulation 1-522.9.2  |
| <hr/> |                          |   |
| 3.    | Describe Non-Compliance: | 40 CFR 60, Subpart Db, §60.49b(g)(10) requires results of daily CEMS drift tests.<br>40 CFR 60, Subpart A, §60.13(d)(1) requires calibration drifts checks at least once each operating day.<br>BAAQMD 1-522.9.2 requires calibrations records to be maintained for a period of at least two years.<br><br>On January 24, 2024, during the preparation of the NSPS Db Semiannual Excess Emissions and Monitoring System Performance Report, it was found that documentation for the Auxiliary Boiler daily calibration drifts checks on 10/20/2023 and 10/21/2023 was not located. The plant experienced a power outage on 10/18/23 and the DAHS lost communication. The Auxiliary Boiler was operating on 10/19 – 21/2023. |
| <hr/> |                          |   |
| 4.    | Submitted By:            | Paula Alba Green ( <a href="mailto:paula.albagreen@corteva.com">paula.albagreen@corteva.com</a> )   |
| <hr/> |                          |   |
| 5.    | Discovery Date:          | January 24, 2024  |
| <hr/> |                          |   |

February 22, 2024

**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-389 ST-HAF

Permit Condition Number: 40 CFR §63.1206(c)(5)(i)(B)

Describe Non-Compliance: On 01/25/24, the pressure in the combustion chamber of the ST-HAF went above ambient pressure for 10 seconds. The AWFCO (Automatic Waste Feed Cutoff System) was engaged in accordance with the requirements of 40 CFR §63.1209(p).

The SSM plan was followed in accordance with 40 CFR §63.1206(c)(2)(v)(A)(2), which states that this malfunction event is not a violation since the SSM plan was followed.

Root Cause: Results of troubleshooting into the cause of this event determined that the I/P transducer on the flow control valve was not functioning properly and had to be replaced. The I/P transducer converts an electrical signal to a pneumatic output. That pneumatic output (i.e., air pressure) ultimately controls the position of the waste feed valve.

Corrective Actions: Identified corrective actions are as follows:

1. The waste feed valve to the ST HAF remained closed until the I/P transducer was replaced.
2. Develop and implement a recurring preventive maintenance (PM) task to inspect the I/P transducer on the waste feed flow control valve.

Page 2  
Mr. Jeff Gove  
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,

A handwritten signature in black ink, appearing to read "JLipscomb", with a horizontal line extending from the end of the signature.

James Lipscomb  
Pittsburg Site Director  
Corteva Agriscience

Attachment: 10-Day Initial Notification

February 2, 2024

**DELIVERED BY EMAIL: Compliance@BAAQMD.gov**  
**cc: 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: S-389 ST-HAF
2. Permit Condition Number: 40 CFR §63.1206(c)(5)(i)(B)
3. Describe Non-Compliance: 

On 01/25/24, the pressure in the combustion chamber of the ST-HAF went above ambient pressure for 10 seconds. The AWFCO (Automatic Waste Feed Cutoff System) was triggered in accordance with the requirements of 40 CFR §63.1209(p).

The SSM plan was followed in accordance with 40 CFR §63.1206(c)(2)(v)(A), which states that this malfunction event is not a violation since the SSM plan was followed.
4. Submitted By: Suzanne Chaewsky
5. Discovery Date: January 25, 2024

February 22, 2024

**Delivered by Email: Compliance@BAAQMD.gov  
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-461, S-462, S-463 – Lontrel (Plant 663)
Permit Condition Number:	40 CFR Part 63 Subpart MMM – National Emission Standards for Hazardous Air Pollutants for Pesticide Active Ingredient Production (PAIP MACT) §63.1368(g)(1).
Describe Non-Compliance:	The PAIP MACT Periodic Report was submitted one day late.
Root Cause:	The PAIP MACT Periodic Report was submitted late due to confusion resulting from multiple compliance reports being compiled for submittal at the same time with different due dates. The PAIP Periodic Report was due one day ahead of the other reports and this was not recognized at the time they were submitted.
Corrective Action:	The identified corrective action is to set an earlier completion date on the internal compliance

Page 2  
Mr. Jeff Gove  
BAAQMD

tracking tool to ensure future submittals are on  
time.

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 'JLipscomb', with a stylized flourish at the end.

James Lipscomb  
Pittsburg Site Director  
Corteva Agriscience

Attachment: 10-Day Initial Notification



February 2, 2024

**DELIVERED BY EMAIL: Compliance@BAAQMD.gov**  
**cc: 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(s): S-461, S-462, S-463 – Plant 663
2. Permit Condition Number: 40 CFR Part 63 Subpart MMM – National Emission Standards for Hazardous Air Pollutants for Pesticide Active Ingredient Production (PAIP MACT)
3. Describe Non-Compliance: 40 CFR 63, Subpart MMM §63.1368(g)(1): The Periodic Report shall be submitted no later than 60 days after the end of the applicable period. The Periodic Report for the 6-month reporting period ending on November 30, 2023, was submitted on January 30, 2024, one day past 60 days after the end of the reporting period.
4. Submitted By: Suzanne Chaewsky
5. Discovery Date: January 30, 2024

March 20, 2024

**Delivered by Email:** [Compliance@BAAQMD.gov](mailto:Compliance@BAAQMD.gov)  
[akobayashi@baaqmd.gov](mailto:akobayashi@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-434 Manufacturing Services

Permit Condition Number: 40 CFR Subpart FFFF – Miscellaneous Organic Chemical Manufacturing National Emission Standard for Hazardous Air Pollutants (MON MACT) §63.2450(a)(2), §63.2455(a), and §2465(a).

Describe Non-Compliance: On February 27, 2024, a leak was discovered on a plug on the H-16 fin fan exchanger (air cooled exchanger). This exchanger is part of the Chlorpyridines MCPU which includes the B-6 distillation process located in Manufacturing Services section of the plant. The exchanger leak caused organic HAP (OHAP) emissions of carbon tetrachloride as well as chlorine emissions (hydrogen halide/ halogen hazardous air pollutant (HHAP)) to the atmosphere that are normally controlled as process vents. The duration of the leak event was approximately 5 hours, 50 minutes (11:52 to 17:42).

Based on Corteva's calculations, it was estimated that 4.9 pounds of carbon tetrachloride and 3.9 pounds of chlorine were released.



Root Cause: The root cause of the leak was determined to be corrosion at the location of the leak.

Corrective Actions:

1. The system was shut down and placed under vacuum to stop the leak to the atmosphere until a repair could be made.
2. A weld repair was completed at the leak location on February 29, 2024.
3. A visual inspection of exchanger plugs identified other potential areas of concern; therefore, these areas were rewelded to ensure leaks would not develop. This work was completed on February 29, 2024.

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

March 6, 2024

**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: 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-434 Manufacturing Services
2. Permit Condition Number: 40 CFR Subpart FFFF – Miscellaneous Organic Chemical Manufacturing National Emission Standard for Hazardous Air Pollutants (MON MACT) 63.2450(a)(2) and 63.2455(a)
3. Describe Non-Compliance: 

On February 27, 2024, a leak was discovered on a plug on the H-16 fin fan exchanger. This exchanger is part of the Manufacturing Services, B-6 distillation process. It is regulated as a Continuous Process Vent (CPV) for carbon tetrachloride and as a process vent for chlorine (a hydrogen halide and halogen hazardous air pollutant (HAP)). The duration of the release was determined to be approximately 5 hours, 50 minutes (11:52 to 17:42). The system was shut down and placed under vacuum to stop the release until a repair could be made.

Based on Corteva’s calculations, it was determined that 4.9 pounds of carbon tetrachloride and 3.9 pounds of chlorine were released.

Concentration data for carbon tetrachloride is not available to determine if the leak was above the 20 ppm leak limit for CPVs. The mass emissions of chlorine released was determined to be less than one pound per hour, the emission limit for hydrogen halide and halogenated HAP process vents.
4. Submitted By: Suzanne Chaewsky ([suzanne.chaewsky@corteva.com](mailto:suzanne.chaewsky@corteva.com))
5. Discovery Date: February 27, 2024

April 3, 2024

**Delivered by Email:** [Compliance@BAAQMD.gov](mailto:Compliance@BAAQMD.gov)  
[akobayashi@baaqmd.gov](mailto:akobayashi@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-434 Manufacturing Services

Permit Condition Number: 40 CFR Subpart FFFF – Miscellaneous Organic Chemical Manufacturing National Emission Standard for Hazardous Air Pollutants (MON MACT) §63.2450(a)(2), §63.2455(a), and §2465(a).

Describe Non-Compliance: On March 13, 2024, a leak was discovered at the elbow on the vent line leaving the H-16 fin fan exchanger (air cooled exchanger). This exchanger is part of the Chlorpyridines MCPU which includes the B-6 distillation process located in Manufacturing Services section of the plant. The exchanger leak caused Organic Hazardous Air Pollutant (OHAP) emissions of carbon tetrachloride as well as chlorine emissions (hydrogen halide/ halogen hazardous air pollutant) to the atmosphere that are normally controlled as process vents. The duration of the release was determined to be approximately 42 minutes (10:18 am to 11:00 am).

Based on Corteva's calculations, it was determined that 1.5 pounds of carbon tetrachloride and 1.2 pounds of chlorine were released.

Root Cause: The root cause of the leak was determined to be corrosion at the location of the leak.

Corrective Actions:

1. The system was shut down, depressurized, de-inventoried, and temporarily patched to stop the leak to the atmosphere.
2. The system remained shut down until the line could be permanently repaired (spool replaced) on March 14, 2024.
3. On March 14, 2024, Ultrasonic Test (UT) readings and x-rays of the piping circuit were completed to verify the integrity of the system. No additional leaks were identified.

If you have any questions, please contact Paula Alba Green at [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

March 22, 2024

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

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Corteva Agriscience – Pittsburg Operations, Pittsburg, California  
Facility Number A0031  
Plant Number 24380**

Description of Non-Compliance referencing Permit Condition Number

1. Source Number: S-434 Manufacturing Services
2. Permit Condition Number: 40 CFR Subpart FFFF – Miscellaneous Organic Chemical Manufacturing National Emission Standard for Hazardous Air Pollutants (MON MACT) §63.2450(a)(2), §63.2455(a), and §63.2465(a).
3. Describe Non-Compliance: 

On March 13, 2024, a leak was discovered at the elbow on the vent line leaving the H-16 fin fan exchanger (air cooled exchanger). This exchanger is part of the Chlorpyridines MCPU which includes the B-6 distillation process located in Manufacturing Services section of the plant. The exchanger leak caused organic HAP (OHAP) emissions of carbon tetrachloride as well as chlorine emissions (hydrogen halide/ halogen hazardous air pollutant (HHAP)) to the atmosphere that are normally controlled as process vents. The duration of the release was determined to be approximately, 42 minutes (10:18 to 11:00). The system was shut down and depressurized. A temporary patch was placed until the line can be replaced.

Based on Corteva’s calculations, it was determined that 1.5 pounds of carbon tetrachloride and 1.2 pounds of chlorine were released.
4. Submitted By: Paula Alba Green ([paula.albagreen@corteva.com](mailto:paula.albagreen@corteva.com))
5. Discovery Date: March 13, 2024