Corteva Agriscience
901 Loveridge Road
Pittsburg, CA 94565

June 23, 2025

DELIVERED BY EMAIL: Compliance@BAAQMD.gov
ccoelho@baaqmd.gov
asalazar@baaqmd.gov

TV Tracking #1133 (Semi-Annual)
1. ☐ RECEIVED IN ENFORCEMENT: 06/23/2025

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

RE: TITLE V MONITORING REPORT
Corteva Agriscience – Pittsburg Operations, Pittsburg, California (Corteva)
Facility Number A0031
Plant Number 24380
Reporting Period: – December 1, 2024 – May 31, 2025

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 for 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 Paula Alba Green at paula.albagreen@corteva.com.

Sincerely,

Kathryn Mowrey
Pittsburg Site Director
Corteva Agriscience

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

January 15, 2025

Delivered by Email: Compliance@BAAQMD.gov
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-707 and S-708
Permit Condition Number:	40 CFR 63 Subpart ZZZZ - §63.6580-63.6675 RICE MACT
Describe Non-Compliance:	40 CFR 63 Subpart ZZZZ, Table 2c(1) requires maintenance of emergency stationary Reciprocating Internal Combustion Engines to be done within a specified number of operating hours or one year plus 30 days of the previous maintenance, whichever comes first. During the facility's second half 2024 Reasonable Inquiry process for Title V semiannual reporting, it was determined that the maintenance for two standby emergency engines, P-1A (S-707) and P-1B (S-708), was not completed within the required timeframe. The following table summarizes the service dates and hours of operations for both pumps.

Year	P1A (S-707)		P1B (S-708)	
	Service Date	Annual Hours of Operation	Service Date	Annual Hours of Operation
2022	6/9/22	26.5	6/9/22	26.8
2023	Not performed	31.7	Not performed	39.6
2024	11/20/24	23.6	Not performed *	22.1

* Maintenance on P1B is being delayed until repairs to P1A are completed. During the required maintenance of P1A, the engine failed, and a part had to be ordered. P1B is the backup engine for P1A, and we must ensure there is a properly functioning engine before it can be taken offline for the required maintenance.

Root Cause:

- Corteva's maintenance scheduling system for compliance tasks associated with these engines was not set up correctly to meet the requirements for the RICE MACT.

Corrective Action(s):

- Modify the task in the Corteva maintenance scheduling system to include RICE MACT requirements.
- Complete the required service for P1B.

If you have any questions, please contact Paula Alba Green at paula.albagreen@corteva.com.

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

Sincerely,

Kathryn Mowrey
Pittsburg Site Director
Corteva Agriscience

Attachment: 10-Day Initial Notification

December 20, 2024

DELIVERED BY EMAIL: Compliance@BAAQMD.gov
akobayashi@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-707 and S-708
2.	Permit Condition Number:	40 CFR 63 Subpart ZZZZ - §63.6580-63.6675 RICE MACT
3.	Describe Non-Compliance:	40 CFR 63 Subpart ZZZZ, Table 2c (1) requires maintenance on emergency stationary Reciprocating internal Combustion Engines to be done within a specified number of hours or operation or 1 year + 30 days of the previous change/inspection, whichever comes first. During the 2024 facility Reasonable Inquiry process for the Title V semiannual reporting, it was determined that the maintenance for the Fire Pumps, P-1A (S-707) and P-1B (S-708) was not completed within 1 year + 30 days of the previous change/inspection. A separate 10-day deviation notification will be submitted for late reporting for the missed activity from the 2023 2H Reasonable Inquiry process.
4.	Submitted By:	Paula Alba Green (paula.albagreen@corteva.com)
5.	Discovery Date:	December 17, 2024

January 15, 2025

Delivered by Email: Compliance@BAAQMD.gov
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-707 and S-708
Permit Condition Number:	Title V Permit, Standard Conditions F – Monitoring Reports
Describe Non-Compliance:	It was determined during the facility's 2024 Reasonable Inquiry process for Title V semiannual reporting that the 2023 Reasonable Inquiry process for reporting period ending on 11/30/23 did not identify missed maintenance and recordkeeping required to comply with the RICE MACT (40 CFR Part 63 Subpart ZZZZ) for emergency engines (P1A – primary backup, P1B – secondary backup). Upon discovery in December 2024, a notification of non-conformance report was submitted within 10 days of discovery as required by Title V Standard Condition F. In an abundance of caution, this was originally identified and managed as a non-compliance with Standard Condition F. Upon preparation of the 30-day report, it was determined that there was no occurrence of non-compliance with Standard Condition F in this instance. A 30-day report is being submitted to close this notification loop and for complete transparency. The non-conformance of missing the required maintenance and associated recordkeeping is addressed in a separate 10- and 30-day notification and the non-conformance will be included in the next semiannual

	compliance report cover the reporting period it was discovered in.
Root Cause:	In December 2023, the Reasonable Inquiry process did not identify that the RICE MACT requirements for P1A/B engines were completed.
Corrective Action(s):	• Ensure future RICE MACT maintenance tasks for P1A/B engines are performed by incorporating them as required compliance tasks in the maintenance management system. • Ensure the Reasonable Inquiry process covers all compliance requirements for the associated reporting period.

If you have any questions, please contact Paula Alba Green at paula.albagreen@corteva.com.

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

Sincerely,

Kathryn Mowrey
Pittsburg Site Director
Corteva Agriscience

Attachment: 10-Day Initial Notification

December 20, 2024

DELIVERED BY EMAIL: Compliance@BAAQMD.gov
akobayashi@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-707 and S-708
2.	Permit Condition Number:	Title V Permit, Standard Conditions F – Monitoring Reports
3.	Describe Non-Compliance:	During the 2024 Reasonable Inquiry process for the Title V semiannual reporting, it was found that the 2023 Reasonable Inquiry process, ending on 11/30/23 failed to identify that the maintenance documentation for Fire pumps P-1A (S-707) and P-1B (S-708) was missing. As required by the Title V permit, Standard condition F, reporting in writing of the non-compliance was not submitted within 10-days of discovery and it was not included in the July 2024 Title V Semiannual report. A separate 10-day Notification, also dated 12/20/2024, has been submitted for the non-compliance.
4.	Submitted By:	Paula Alba Green (paula.albagreen@corteva.com)
5.	Discovery Date:	December 17, 2024

March 14, 2025

Delivered by Email: Compliance@BAAQMD.gov
akobayashi@baaqmd.gov

Jeff Gove
Director of Enforcement
Bay Area Air District (BAAD)
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:	Not applicable
Permit Condition Number:	BAAD Regulation 8-5-404 – Inspection, Abatement Efficiency Determination and Source Test
Describe Non-Compliance:	Reports that certify compliance with BAAD Regulation 8-5-403, based on successfully passing pressure relief device inspections performed in July and October of 2024, were not submitted within 60-days of the inspection dates, as required by BAAD Regulation 8-5-404. These reports and the first quarter 2025 report were submitted to the BAAD on February 27, 2025.
Root Cause:	The reporting tasks in the site-specific compliance task system were associated with BAAD Regulation 8-5-404 were marked complete by a staff person who believed reporting was only required when a regulated pressure relief device failed inspection.

Corrective Action(s):

- Ensure employees responsible for submitting BAAD Regulation 8-5-404 reports are properly trained on the reporting requirement. Completed on February 27, 2025.
- Submit missing inspection reports to BAAD. Completed on February 27, 2025.

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,

Kathryn Mowrey
Pittsburg Site Director
Corteva Agriscience

Attachment: 10-Day Initial Notification

February 28, 2025

DELIVERED BY EMAIL: Compliance@BAAQMD.gov
akobayashi@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:	Not applicable
2.	Permit Condition Number:	BAAD Regulation 8-5-404 – Inspection, Abatement Efficiency Determination and Source Test Reports
3.	Describe Non-Compliance:	A report that certifies compliance with Regulation 8-5-403 based on completed pressure relief device inspections performed in July and October of 2024 were not submitted within 60-days. The reports were submitted on February 27, 2025.
4.	Submitted By:	Suzanne Chaewsky (suzanne.chaewsky@corteva.com)
5.	Discovery Date:	February 27, 2025