

Nebraska Department of Environment and Energy (NDEE)

NPDES Wastewater Section

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MEMORANDUM

To: File

From: Mark Pomajzl

Date: September 11, 2020

RE: AltEn, LLC

NDEE ID: 84069

Program ID: NE0137634, NER910444

Subject: Site Visit Report (Stormwater Aspects Only) from Inspection – Mark Pomajzl, Hillary Stoll, and Jason Holsten Present

Opening Conference

Hillary Stoll, Jason Holsten, and Mark Pomajzl (myself) arrived at the facility on or about 9:00 am and asked to speak to Mr. Scott Tingelhoff (Plant Manager). We explained that we were going to conduct a site visit. Mr. Tingelhoff provided the facility tour, at no time was access denied. The observations included in this memo are based solely on storm water observations. After the visit, we conducted a final conference and provided an exit summary.

Observation Area 1 (OA1), Map 1

OA1 is the distiller's grains staging area. Solids are conveyed to a collection area where they are loaded onto trucks and transported to various areas for storage. The pad used to load wet distiller's grains contains residue that is being washed into an area that drains to a ditch leading to storm water outfall 001 (photos 1, 2).

Observation Area 2 (OA2), Map 1

OA2 is the biochar process area, which is located south of the main ethanol production plant. The area west of the biochar unit is used to store final product. There is residual wet distiller's grain and chaff observed below the wet distiller's grain unloading conveyance system (photo 3). There is biochar product spilled along the final product auger system (photo 4). Some bags are torn, dispersing product (photo 5). Wet cake residue is observed discharging into the conveyance system on the west side of the biochar unit (photos 5, 6). A culvert conveys water to storm water outfall 001, south and east of this area. A review of the storm water pollution prevention plan (SWPPP) notes that the facility installed silt fencing to control runoff. There was no silt fence observed (photo 7). I asked Mr. Tingelhoff about the missing silt fence. Mr. Tingelhoff stated



that he hadn't read the SWPPP, but believed the silt fence was originally installed to control starch spills. Mr. Holsten asked Mr. Tingelhoff if the biochar product has been analyzed for pesticides. Mr. Tingelhoff said that it had been, but Mr. Tanner Shaw would have that information. Mr. Tingelhoff stated he can request the results.

Observation Area 3 (OA3), Map 1

OA3 is east of the grain receiving area. In this area, an unknown teal-colored substance is observed (Photo 8). I asked Mr. Tingelhoff of the substance identity, but the substance was never identified. The facility has not contained the spill with absorbent socks or other spill prevention method. Above the spill, a green hose is observed attached to a pumping system. The end of the hose is not in containment. In the same area, there is an unlabeled tote of unknown liquid along with uncontained and unidentified hoses and a fuel tank (Photos 9, 10, 11). Mr. Tingelhoff stated that the facility is currently shut down and the hoses are not connected.

Observation Area 4 (OA4), Map 1

OA4 is the urea storage area. Temporarily, the facility has pumped thin stillage into the urea containment (photo 12). The facility is replacing a pump used to transport thin stillage to the wastewater lagoons and some stillage has dripped near the pump (photo 13). The facility has not employed absorbent socks or any spill control measures.

Observation Area 5 (OA5), Map 1

OA5 is the manhole/access point for the force main used to transfer thin stillage from the facility to the lagoon system. On the north side, the facility has spilled thin stillage into the swale which drains to the storm water outfall 001. Due to the unstained area between the thin stillage and the manhole, it appears that the facility may have pumped the thin stillage into the swale area, which is depicted in photos 14, 15, and 16.

Observation Area 6 (OA6), Map 1

OA6 is the tank farm depicted in photo 17. Inside the tank farm berm are two totes of unlabeled and unknown material along with some trash. On the north side of the berm is spilled red granular material, which is depicted in photo 18. This material is similar to the material observed in the totes.

Observation Area 7 (OA7), Map 2

OA7 is located on the northwest corner of the south lagoon. This area contains an air relief vent and valve control system for the three lagoon system. The vent system has recently moved but the system has spilled thin stillage, which is depicted in photo 19. The facility has not contained the spill with countermeasures. The manhole contains rocks and sand, which is depicted in Photo 20.

Final Conference and Exit Summary

Following the site visit and tour, we met with Mr. Tingelhoff and Mr. Peterson to discuss the findings and provide the exit summary. I expressed concern that the biochar process didn't contain a silt fence as described in the SWPPP. I read to Mr. Tingelhoff the sentence in the SWPPP that states that the silt fence had been installed. Mr. Tingelhoff stated they thought it was

for starch, but will reinstall the silt fence immediately. We explained that the lagoons are lower than we expected and asked how they are being managed. Mr. Tingelhoff stated that they are conducting business as usual and irrigation. We asked him if they have irrigated from the lagoon system. Mr. Tingelhoff stated they have been irrigating. We stated that the notice of violation (NOV) has not been closed and that they shouldn't be land applying. Mr. Tingelhoff stated that communication has been difficult due to multiple departments and that he hadn't received an answer from their recent submittal. We informed Mr. Tingelhoff and Mr. Peterson that we discovered a thin stillage spill north of the manhole/access for the force main (photos 15, 16, and 17). Mr. Peterson stated that he is aware of the spill and that the area will be cleaned. We also informed them the air vent and valve control system had spilled thin stillage, which they agreed to clean up the spill. We expressed concern about the southeast berm used to control the north wet distiller's grain storage area. We stated that we did not visually see the berm. Mr. Tingelhoff stated the berm is there, but is covered with grasses and vegetation. After the discussion, we provided Mr. Tingelhoff with the exit summary form.

List of concerns and potential violations

Section 4.1 Storm Water Generation

- 1) It was observed during the inspection that there is no silt fencing around the biochar process and super stacks storage. The SWPPP states that as a "Best Management Practice, AltEn has installed silt fencing around the biochar process to reduce the likelihood of any pollutants to admixture with storm water."

Section 5.1 Good Housekeeping Practices

- 1) There are no best management practices (BMPs) installed to control runoff from the wet cake load out area. There is no mention of BMPs in the SWPPP to control potential runoff from this area.
- 2) There are hoses attached and unattached to pumps in various locations. Depending on location, hoses can contain chemical/product. The residual chemical/product could escape into the storm water conveyance system.
- 3) The tank farm berm contains two unlabeled totes, which contain an unknown red granular material. There is also unknown red granular material spilled on the north side of the tank farm berm. The SWPPP states that "a visual inspection is performed to note the absence of a sheen – indicating the presence of oil." The SWPPP does not state that it is an area used for tote storage.
- 4) There are spilt and dispersing biochar super sacks in and around the biochar process. In addition there is storm water runoff containing wet cake residue entering the storm water conveyance system.

Section 5.4 Spill Prevention (also Good housekeeping Concerns)

- 1) There is a thin spillage spill near the manhole/access point for the force main used to transfer thin stillage to the wastewater lagoons. The SWPPP specifically states that "AltEn requires that all employees, representatives and contractors work to prevent spills." There is also a spill of unknown teal colored material east of the grain storage

area and the air lift valve control system. All of these spills require Corrective Action Reports (CARs) in accordance to Section **5.6.2 of the facility SWPPP**.

- 2) The facility is not responding to spills and leaks as required in section **5.5 spill response** in the facility SWPPP. The SWPPP states that the facility has adopted response procedures for addressing spill emergencies.
- 3) There are unlabeled chemical totes in various locations. **Section 5.4 Spill Prevention** in the facility SWPPP states that containers are to be plainly labeled that could be susceptible to spillage or leakage.

Signature: Mark Pomajzl

Date: 9-29-2020

Photo Log



Photo 1

Site Visit Report

Observation Area: 1

Date Taken: September 11, 2020

Photographer: Mark Pomajzl

Facility Name/Project Name: AltEn, LCC

Facility IIS Number/Project Identifier: NER910444, IIS: 84069

Direction Facing: Southeast

Description: The structure pictured in the photo is the wet cake load out area for the facility. The solids are conveyed to a collection area where they are loaded onto trucks and transported to various storage locations.



Photo 2

Site Visit Report

Observation Area: 1

Date Taken: September 11, 2020

Photographer: Mark Pomajzl

Facility Name/Project Name: AltEn, LCC

Facility IIS Number/Project Identifier: NER910444, IIS: 84069

Direction Facing: Southwest

Description: The photo depicts wet cake runoff from the southwest portion of the distiller's grain storage.
There are not BMPs installed to control these discharges.



Photo 3

Site Visit Report

Observation Area: 2

Date Taken: September 11, 2020

Photographer: Mark Pomajzl

Facility Name/Project Name: AltEn, LCC

Facility IIS Number/Project Identifier: NER910444, IIS: 84069

Direction Facing: East

Description: This photo depicts the Biochar process. There is wet cake in the forefront and on the right hand side. The facility is not conducting good housekeeping.



Photo 3

Site Visit Report

Observation Area: 2

Date Taken: September 11, 2020

Photographer: Mark Pomajzl

Facility Name/Project Name: AltEn, LCC

Facility IIS Number/Project Identifier: NER910444, IIS: 84069

Direction Facing: East

Description: This photo depicts the final product loadout. There is observed biochar product on the ground with no installed BMPs.



Photo 4

Site Visit Report

Observation Area: 2

Date Taken: September 11, 2020

Photographer: Mark Pomajzl

Facility Name/Project Name: AltEn, LCC

Facility IIS Number/Project Identifier: NER910444, IIS: 84069

Direction Facing: East

Description: This is photo depicting a torn bag of biochar super sack. There is no good housekeeping measures or BMPs being employed to contain the spilled product.



Photo 5

Site Visit Report

Observation Area: 2

Date Taken: September 11, 2020

Photographer: Mark Pomajzl

Facility Name/Project Name: AltEn, LCC

Facility IIS Number/Project Identifier: NER910444, IIS: 84069

Direction Facing: Northwest

Description: This photo depicts residual wet cake. Wet cake is unloaded into the Biochar for processing, excess wet distiller's grain and chaff disperses and accumulates on the ground. Rain causes the residue to concentrate and discharges into the conveyance system, which leads to outfall 001.



Photo 6

Site Visit Report

Observation Area: 2

Date Taken: September 11, 2020

Photographer: Mark Pomajzl

Facility Name/Project Name: AltEn, LCC

Facility IIS Number/Project Identifier: NER910444, IIS: 84069

Direction Facing: Northwest

Description: This photo depicts residual wet cake. Wet cake is unloaded into the Biochar for processing, excess wet distiller's grain and chaff disperses and accumulates on the ground. Rain causes the residue to concentrate and discharges into the conveyance system, which leads to outfall 001. This photo depicts apparent sheet erosion, which conveys to outfall 001.



Photo 7

Site Visit Report

Observation Area: 2

Date Taken: September 11, 2020

Photographer: Mark Pomajzl

Facility Name/Project Name: AltEn, LCC

Facility IIS Number/Project Identifier: NER910444, IIS: 84069

Direction Facing: South

Description: This photo depicts the missing silt fence. The facility SWPPP states that a silt fence had already been installed.



Photo 8

Site Visit Report

Observation Area:3

Date Taken: September 11, 2020

Photographer: Mark Pomajzl

Facility Name/Project Name: AltEn, LCC

Facility IIS Number/Project Identifier: NER910444, IIS: 84069

Direction Facing: Southwest

Description: This photo depicts an unknown teal liquid, which is located east of the grain unloading area. Mr. Tingelhoff could not identify its origin or its content. The green hose above is connected to a pumping system, it is unknown if the teal liquid came from this hose.



Photo 9

Site Visit Report

Observation Area: 3

Date Taken: September 11, 2020

Photographer: Mark Pomajzl

Facility Name/Project Name: AltEn, LCC

Facility IIS Number/Project Identifier: NER910444, IIS: 84069

Direction Facing: East

Description: This photo depicts an unlabeled chemical tote. Next to the tote are hoses of unknown origin. It is unknown if the hoses contain pollutants.



Photo 10

Site Visit Report

Observation Area: 3

Date Taken: September 11, 2020

Photographer: Mark Pomajzl

Facility Name/Project Name: AltEn, LCC

Facility IIS Number/Project Identifier: NER910444, IIS: 84069

Direction Facing: East

Description: This photo depicts a series of unlabeled hoses. It is unknown if these hoses contain chemical or product.



Photo 11

Site Visit Report

Observation Area: 3

Date Taken: September 11, 2020

Photographer: Mark Pomajzl

Facility Name/Project Name: AltEn, LCC

Facility IIS Number/Project Identifier: NER910444, IIS: 84069

Direction Facing: Southwest

Description: This photo depicts a series of hoses dispersed along the grass and a possible fuel tank. The tank is not labelled.

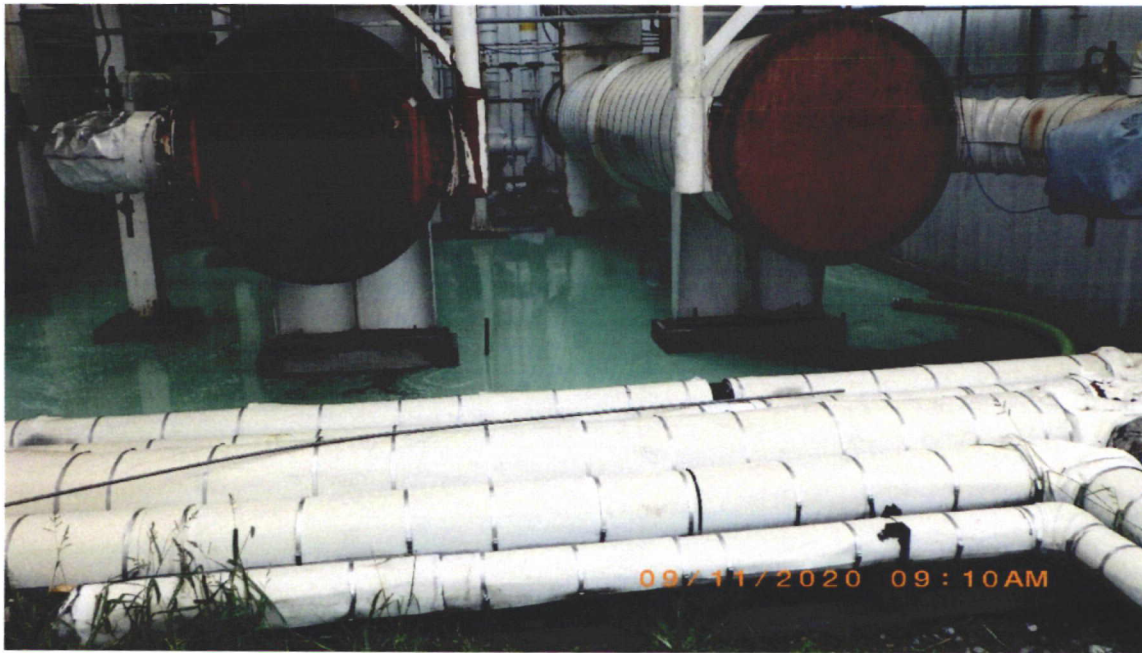


Photo 12

Site Visit Report

Observation Area: 4

Date Taken: September 11, 2020

Photographer: Mark Pomajzl

Facility Name/Project Name: AltEn, LCC

Facility IIS Number/Project Identifier: NER910444, IIS: 84069

Direction Facing: West

Description: This photo depicts thin stillage that has been temporarily discharged into the urea containment.



Photo 13

Site Visit Report

Observation Area: 4

Date Taken: September 11, 2020

Photographer: Mark Pomajzl

Facility Name/Project Name: AltEn, LCC

Facility IIS Number/Project Identifier: NER910444, IIS: 84069

Direction Facing: West

Description: This photo depicts thin stillage staining the ground surrounding the transfer pump. The facility is not using spill/leak prevention controls.



Photo 14

Site Visit Report

Observation Area: 5

Date Taken: September 11, 2020

Photographer: Mark Pomajzl

Facility Name/Project Name: AltEn, LCC

Facility IIS Number/Project Identifier: NER910444, IIS: 84069

Direction Facing: North

Description: This photo depicts a thin stillage spill that apparently came from the manhole/force main. There is a large area free of thin stillage, which indicates the manhole may have been pumped out. The facility did not implement spill prevention procedures. This spill flows into a swale which leads to storm water outfall 001.



Photo 15
Site Visit Report
Observation Area: 5
Date Taken: September 11, 2020
Photographer: Mark Pomajzl
Facility Name/Project Name: AltEn, LCC
Facility IIS Number/Project Identifier: NER910444, IIS: 84069
Direction Facing: North
Description: This photo depicts the spill facing south.



Photo 17

Site Visit Report

Observation Area: 5

Date Taken: September 11, 2020

Photographer: Mark Pomajzl

Facility Name/Project Name: AltEn, LCC

Facility IIS Number/Project Identifier: NER910444, IIS: 84069

Direction Facing: South

Description: This photo depicts the area that we last noticed thin stillage.



Photo 17

Site Visit Report

Observation Area: 6

Date Taken: September 11, 2020

Photographer: Mark Pomajzl

Facility Name/Project Name: AltEn, LCC

Facility IIS Number/Project Identifier: NER910444, IIS: 84069

Direction Facing: South

Description: This photo depicts the tank farm. There are two unlabeled totes with red granular material. This berm is periodically discharged into the conveyance leading to outfall 001.



Photo 18

Site Visit Report

Observation Area: 6

Date Taken: September 11, 2020

Photographer: Mark Pomajzl

Facility Name/Project Name: AltEn, LCC

Facility IIS Number/Project Identifier: NER910444, IIS: 84069

Direction Facing: East

Description: This photo depicts spill of red granular material similar the totes in the above photo. This is located on the north side of the tank farm berm.



Photo 19

Site Visit Report

Observation Area: 7

Date Taken: September 11, 2020

Photographer: Mark Pomajzl

Facility Name/Project Name: AltEn, LCC

Facility IIS Number/Project Identifier: NER910444, IIS: 84069

Direction Facing: Southwest

Description: This photo depicts a thin spillage leakage on and around the junction box between the south and northeast lagoon.

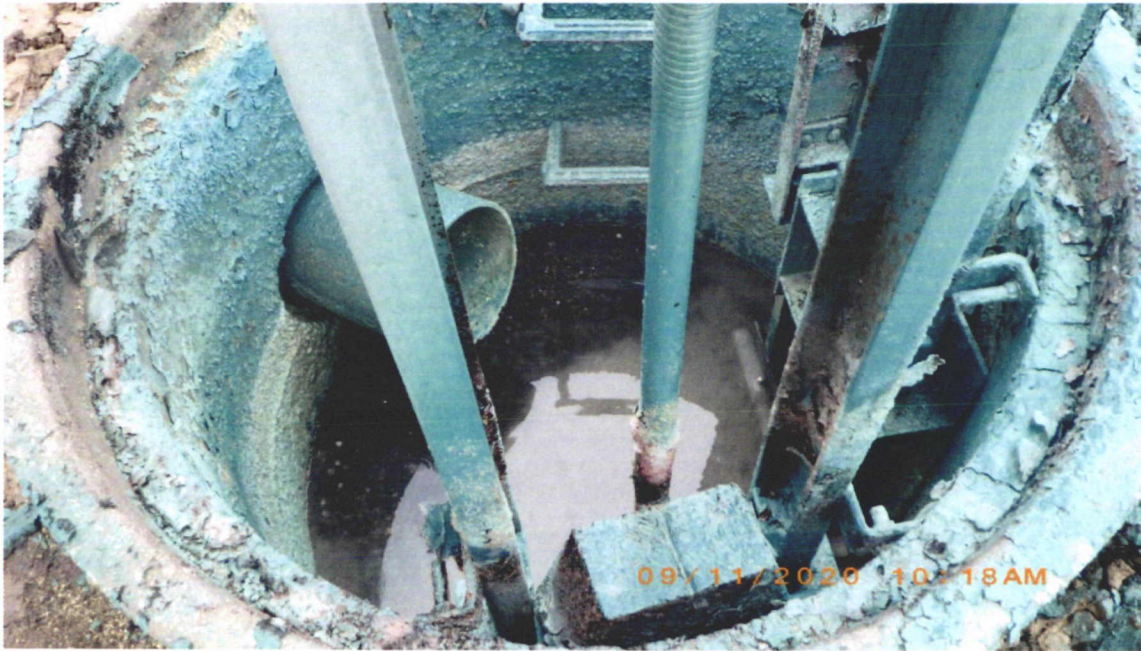


Photo 20

Site Visit Report

Observation Area: 7

Date Taken: September 11, 2020

Photographer: Mark Pomajzl

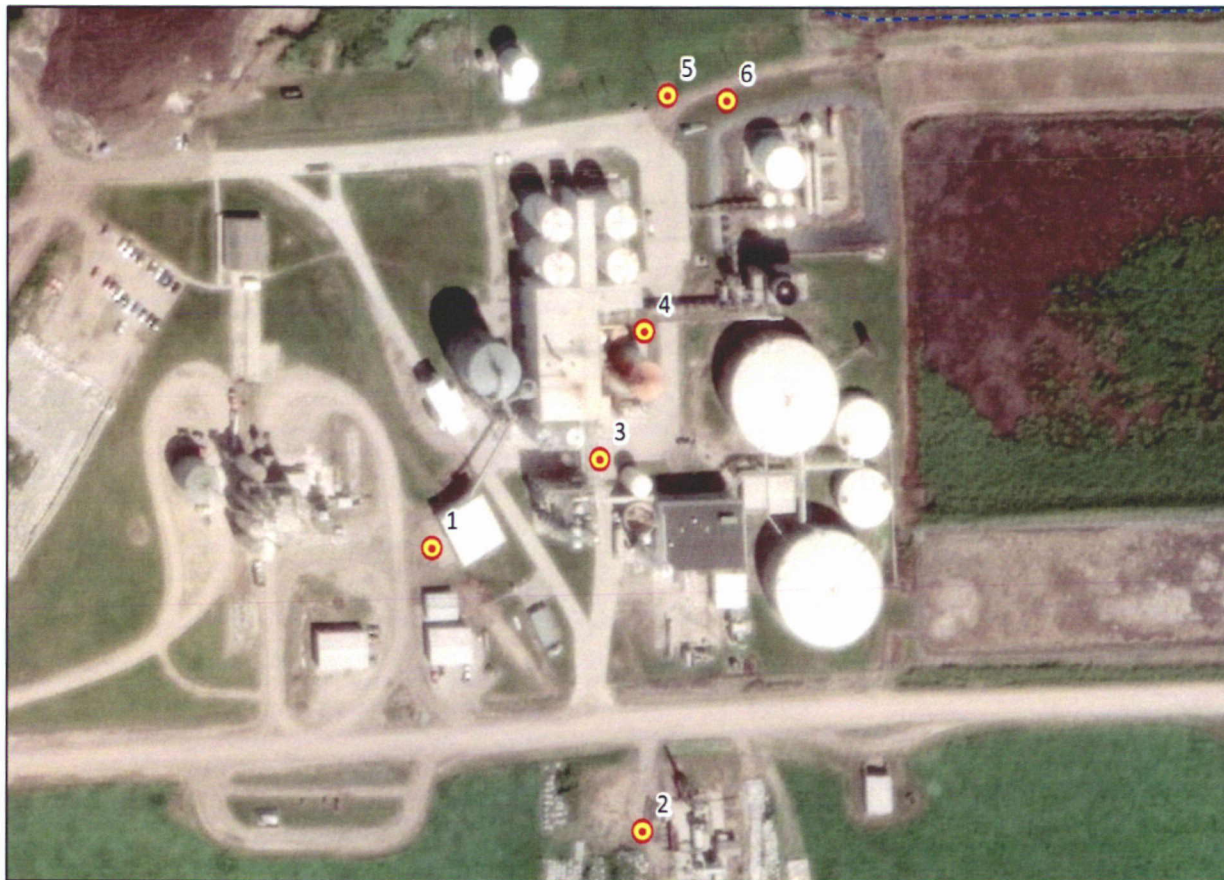
Facility Name/Project Name: AltEn, LCC

Facility IIS Number/Project Identifier: NER910444, IIS: 84069

Direction Facing: East

Description: This photo depicts that the junction box filled with gravel and sand. The photo also depicts the lack of spill prevention and storm water controls.

AltEn LLC Site Visit - Map 1
September 11, 2020



Address: 11344 County Road 10, Mead NE
NDEQ ID: 84069
Program ID: NE0137634 / NER910444

0 62.5 125 250 375 500
Feet

NEBRASKA
DEPT. OF ENVIRONMENT AND ENERGY

JW - September 2020

AltEn LLC Site Visit - Map 2
September 11, 2020



Address: 11344 County Road 10, Mead NE
NDEQ ID: 84069
Program ID: NE0137634 / NER910444

0 150 300 600 900 1,200
Feet

NEBRASKA

DEPT. OF ENVIRONMENT AND ENERGY

JW - September 2020

DEPT. OF ENVIRONMENTAL QUALITY

120 9 91 24844

Inspection Date: 9-1-20 Start Time: End Time:☐ Further agency discussion needed

- * No salt in Irrigation Water
- * No salt in Lagoon water
- * No salt from ground in Boreholes
- * Traces of salt along with the water
- * Irrigation from Lagoon (Necessary Instrument) An Irrigation method which the farmer can't

Cleaning Spills (SAP)
 In case of spill
 Report to your boss in Lab, you
 Talk to others about Lab Acc.

The Department will provide a final inspection report to you usually within 45 days of the inspection. The final inspection report will contain a complete list of any alleged violations. This inspection exit summary does not preclude any other legal action by the Nebraska Department of Environmental Quality and your prompt attention to the documented concerns will be considered in assessment of your voluntary compliance. This summary was left

Inspector Signature _____

SIGNING THIS DOCUMENT IS NOT AN ADMISSION OF LIABILITY BY THE TOWNSHIP

revised 12/17/15