

NPDES Wastewater Section
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MEMORANDUM

To: File

From: AltEn, LLC

Date: October 11, 2018

RE: Site visit – Mark Pomajzl and Dan LaMaistre

NDEQID: 84069

Program ID: NE0137634, NER910444

Weather: Rain, cool 40F

We arrived onsite on or around 9:00 presented our credentials to the receptionist. We stated that we are following up with a recent complaint. I requested to speak with Mr. Scott Tingelhoff. Mr. Tingelhoff was in a meeting, I requested that I still speak with him. The receptionist informed Mr. Tingelhoff of our request and left the meeting. We greeted Mr. Tingelhoff, informed him, and explained that the Department continues to receive complaints. Mr. Tingelhoff granted us access to records and facility tour, at no time was access denied.

Industrial Storm Water (ISW) Internal File Review

ISW/SWPPP Elements	Description	Observation
ISW Notice of Intent (NOI)	NOI: This form is required to gain covered under the ISW-General Permit.	Received by the Department on December 15, 2016. The NOI maps only lists the ethanol potential pollutants. The Recycling system and Biochar are not included in the application.
Corrective Action Reports (CAR)	A report generated and submitted to NDEQ in the event of an unauthorized discharge. See	There are no CARs submitted.



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	SWPPP Section 5.6 Spill Prevention and Reporting	
Material Inventory Form (MIF)	This list is a required attachment of the NOI. The form lists areas at the facility that could impact storm water	The MIF does not list the BioChar system or the Recycling facility.

Industrial Storm Water (ISW) On Site File Review

ISW/SWPPP Elements	Description	Observation
ISW Notice of Intent (NOI)	NOI: This form is required to gain covered under the ISW-General Permit.	NOI is available with the ISW folder.
Storm Water Pollution Prevention Plan (SWPPP)	SWPPP: Site-specific document used to help document and prevent pollution from entering water systems.	Provided
Routine Inspections	*Schedule *Inspector Identified *During Storm Events *How Many	Mary Tingelhoff (EHS) manager stated that the previous plant manager (Jim Stuart) took care of the storm water inspections and monitoring. She also stated that he left and nobody knows where the paper work is located.
Quarterly Visual	Reports	Not provided
Comprehensive Annual	This report is an inspection of the entire facility on a yearly basis.	Not provided
Outfalls Defined	Outfalls for ISW and SWPPP.	The SWPPP defines two separate outfalls (001) and (002).

Benchmark Monitoring	Sampling for specific parameters for the ISW-Permit	The facility does have benchmark monitoring.
SWPPP Reviews and Updates	Most recent updates to the SWPPP. These documents should be filed with the SWPPP.	Facility reviews the SWPPP on a yearly basis, at that time updates will take place. The last update was in year 2015.

Facility Site Inspection (ISW)

Treatment Stage	Description	Observation
Wet Cake Storage area used for BioChar.	Located on the northwest portion of the property. The wet cake consists of used and treated seed corn to create bio-char.	According to facility staff, the wet cake area was moved to this area with guidance provided by the Nebraska Department of Environmental Quality (NDEQ). There are no BMPs in place to control pro
Best Management Practices (BMPs)	BMPs are designed to help control pollution from exiting the site onto the environment.	There are no BMPs in place to control runoff from starch holding pads. Three starch bags are leaking and punctured on the east side of the main production area. (photo 1, 3, 4) In addition, starch bags are punctured and leaking on the north production area near the BioChar system (photo 15). Starch is exiting the pad into a waterway, which is an intermittent tributary of Silver Creek. Also noted potential track out in these areas. Beer and pop stored on the north production area (photo 2), which are not clearly labeled. Ethylene Glycol barrels noted on the south production area (photo 8). These barrels are not in containment.
Good Housekeeping	Process in which the facility keeps the grounds clean and in good working condition.	Trash noted in the seed unloading area (photo 8, 9). Trash noted near the recycling area, near the storage building and compactor.
Corrective Action Report (CAR)	The CAR is used to describe an non-compliance and what the facility will do to solve the non-compliance	No corrective actions submitted to the Department or documented on site.

Facility Site Inspection (Wastewater)

Cell System	Three cell complete retention with land application	There are two original cells located facility northeast side. These Cells have torn liners, caused by tornado damage. The liners are allowing wastewater behind the liners and causing them to bubble. About half way between the two cells. The dike liner is torn and floating in the south Cell (photo 8). Exposed soil has rills from recent rain (photo 8). The south cell has recently operated in the area designated for freeboard. The north cell also has liner damage with liners bubbling on the Cell surface. Cell three is west and is new, completed less than two months ago and contains approximately eight feet of water. The Cell is 25 foot deep. The liner is new and in good condition with no rips or tears. The Cells have normal wastewater odors at this time.
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Summary

1. There are no inspections available for review. The EHS manager stated that the previous plant manager conducted these inspections and that they are trying to catch up. It is required that inspections are available when requested regardless of who conducted them or who is responsible. In addition, Table 1-1 of the SWPPP specifically states that the EH&S Manager is responsible for maintaining the SWPPP, spill reports, annual reviews, site inspections and ensuring that all aspects of the SWPPP is accurate and up-to-date when the plant manager is unavailable.
2. The SWPPP does not mention the wet cake storage area and BMPs used to contain runoff. Staff stated this wet cake is outdated or unsold seed corn and is not used for cattle feed but is used for a new process called BioChar. BioChar is the reduction of wet cake to charcoal like material, and used for plant fertilizer. The SWPPP does not mention this technology nor how to control potential spills.
3. As mentioned above the SWPPP does not include the wet cake and BioChar processes. Section 4.3 Exposed Materials and Potential Pollutants, states, "Due to the BMPs in place, AltEn does not expect any pollutants to be present in the storm water discharge from the facility in significant quantities. Any potential pollutants that may be present in storm water discharges are detailed in the inventory worksheet." The SWPPP does not contain the inventory checklist therefore could not be inspected.
4. Section 5.1 Good Housekeeping Practices lists proper storage / disposal of materials as part of the protocol for the prevention of possible accidents and releases in the environment. Your facility is discharging potentially high strength BOD water from speared starch bags. Section 5.1 specifically states that prompt cleanup of minor spills will take place.

5. The seed unloading area noted seed bag trash (photo 10). Section 5.1 Good House Keeping Practices states that the facility practices frequent garbage, rubbish and sanitary waste disposal and proper storage and disposal of materials.
6. This inspection noted potential for track out of spilled and discharging starch. The SWPPP does not include a BMP for track out. The Department requests that you amend the SWPPP to include track out as a potential pollutant source and BMP.
7. The facility uses Ethylene Glycol for lubrication for some motors and valves. The noted barrels are not in containment (photo 11). There are potential for spills and leaks.
8. The EHS manager stated that they conduct inspections and are training employees. The inspection noted trash, spills, potential track out and discharges into waters of the State. No inspections or training records provided during the inspection could substantiate training or inspections.
9. There are numerous pallets of bagged starch located throughout the facility (photos 1, 2, 13, 14). The facility labeled these bags as "Industrial". This labeling is not consistent with Section 5.4 Spill Prevention. The section states that all potential containers susceptible to spillage be plainly labeled to encourage handling and rapid response if spills occur. The current means of determining the content of these pallets is by closely examining the bags or asking facility staff.
10. Beer and pop are stored and exposed on the north side of the north production area. The facility would like to use these products in the fermenting process but will require special monitoring equipment, which is not installed. The Department recommends that the facility not discharge beer and pop directly into the Cell system. The introduction of high carbohydrates and sugar could inhibit wastewater treatment and create an odor problem. These products are not listed as a potential pollutant source. The inventory worksheet needs to be updated to include beer and pop and BMPs to control potential containments from coming in contact with storm water.
11. The facility employs a three cell non-discharging system with land application. The west cell is new construction and finished less than two months ago. The original two-cell system has liner damage from a tornado. Liners are torn and are bubbled in places due to wastewater seeping behind the liner (photos 6, 7, 8). The south cell has recently been above freeboard and some erosion in exposed areas (photos 8, 9).
12. Soybeans bags noted in the grain storage structure. Please report any process change to the Air Quality Unit at 1-402-471-4141.

Attachments: Photos, Site Maps

Photo Log



Photo #: 1

Photo date: 10-12-2018

Project Name: AltEn, LLC

Photographer: Mark Pomajzl

Direction facing: Southeast

GPS/Site location: N 41.19677 W 96.47887

Description: One of the starch storage areas. This batch is located south of the ethanol production area.



Photo #: 2

Photo date: 10-12-2018

Project Name: AltEn, LLC

Photographer: Mark Pomajzl

Direction facing: South

GPS/Site location: N 41.19680 W 96.47837

Description: Beer and pop totes stored in cleaned chemical totes. The labeling does not clearly indicate that beer and pop are stored in these totes (notice the placard)



Photo #: 3

Photo date: 10-12-2018

Project Name: AltEn, LLC

Photographer: Mark Pomajzl

Direction facing: South

GPS/Site location: N 41.19672 W 96.47800

Description: Stored starch north of the ethanol plant. Three bags are broken and discharging along the cement pad.



Photo #: 4

Photo date: 10-12-2018

Project Name: AltEn, LLC

Photographer: Mark Pomajzl

Direction facing: South

GPS/Site location: N 41.19672 W 96.47800

Description: Stored starch north of the ethanol plant. This is the same bags as the above photograph. The facility did not attempt to contain or clean the area during the inspection.



Photo #: 5

Photo date: 10-12-2018

Project Name: AltEn, LLC

Photographer: Mark Pomajzl

Direction facing: North

GPS/Site location: N 41.19691, W 96.47756

Description: Wastewater spilled north of the ethanol plant. North of the spillage is the beginning of the intermittent tributary of Clear Creek. The area was not clean during the inspection.



Photo #: 6

Photo date: 10-12-2018

Project Name: AltEn, LLC

Photographer: Mark Pomajzl

Direction facing: Northwest

GPS/Site location: N 41.19908, W 96.47386

Description: Cell liner bubbling on the north cell.



Photo #: 7

Photo date: 10-12-2018

Project Name: AltEn, LLC

Photographer: Mark Pomajzl

Direction facing: Northwest

GPS/Site location: N 41.19908, W 96.47386

Description: Cell liner bubbling on the north cell.



Photo #: 8

Photo date: 10-12-2018

Project Name: AltEn, LLC

Photographer: Mark Pomajzl

Direction facing: South

GPS/Site location: N 41.19906, W 96.47449

Description: Part of the liner torn and laying the south Cell. There is water pooled on the backside of the liner (arrow). There is also rill erosion noted.



Photo #: 9

Photo date: 10-12-2018

Project Name: AltEn, LLC

Photographer: Mark Pomajzl

Direction facing: South

GPS/Site location: N 41.19913, W 96.47659

Description: West side of the original Cell system. There is indication of the recent water levels above freeboard and nearly overflowing dikes.



Photo #: 10

Photo date: 10-12-2018

Project Name: AltEn, LLC

Photographer: Mark Pomajzl

Direction facing: South

GPS/Site location: Not recorded

Description: Trash located along the seed unloading area.



Photo #: 11
 Photo date: 10-12-2018
 Project Name: AltEn, LLC
 Photographer: Mark Pomajzl
 Direction facing: South
 GPS/Site location: N41.19557, W 96.47807
 Description: Ethylene Glycol used but not in containment.



Photo #: 12
 Photo date: 10-12-2018
 Project Name: AltEn, LLC
 Photographer: Mark Pomajzl
 Direction facing: South
 GPS/Site location: Not recorded
 Description: Soybeans located in the corn storage building. Mr. Egr stated that soybeans would not cause problems with the process.



Photo #: 13

Photo date: 10-12-2018

Project Name: AltEn, LLC

Photographer: Mark Pomajzl

Direction facing: Southwest

GPS/Site location: Not recorded

Description: Speared bags of starch on the north side of the ethanol production area.



Photo #: 14

Photo date: 10-12-2018

Project Name: AltEn, LLC

Photographer: Mark Pomajzl

Direction facing: Southwest

GPS/Site location: Not recorded

Description: Speared bags of starch on the north side of the production area.



Photo #: 15

Photo date: 10-12-2018

Project Name: AltEn, LLC

Photographer: Mark Pomajzl

Direction facing: Southeast

GPS/Site location: Not recorded

Description: BioChar system.

Satellite Imagery

AltEn, LLC
Google Maps



GIS Map
AltEn, LLC

