

Nebraska Department of Environment and Energy (NDEE)

MEMORANDUM

To: File

From: Mark Pomajzl

Date: February 1, 2021

RE: AltEn, LLC

NDEE ID: 84069

Program ID: PCS NER910444

Subject: Site Visit Report (Stormwater only)

Opening Conference

Hillary Stoll, Jason Holsten and Mark Pomajzl (myself) arrived at the facility on or about 9:30 am. We asked to speak to Mr. Scott Tingelhoff (Plant Manager). According to the secretary, Mr. Tingelhoff had not arrived yet. We stated that we were conducting a site visit and needed a facility tour. Mr. Peterson was available and provided the tour. At no time was access denied. The observations in this memorandum are only associated with stormwater. After the tour, we conducted the exit interview and filled out the exit summary with Mr. Dean Egr and Mr. Peterson.

Observation Area 1 (OA1), Map 1

OA1 is the Biochar Process, which is located south of the main ethanol production plant. The area west of the Biochar is used to store super sacks of process biochar, photos 1 and 2. In accordance with the storm water pollution prevention plan (SWPPP), the facility installed a silt fence around the Biochar Process, photos 3 and 4.

Observation Area 2 (OA2), Map 1

OA2 is north of the Biochar Process. There are unlabeled empty chemical totes stored in this area. Mr. Peterson stated that they are waiting on vendor pick up. It is unknown how much residual chemical is contained in these totes and if they are leaking. There is evidence of track out of mud from this area, which could contain residual chemical, photo 5.

Observation Area 3 (OA3) Map 1

OA3 is the grain receiving conveyance system. Grain is unloaded via truck where it is conveyed to additional storage prior to production. Snow banks surrounding the receiving area are stained green with grain dust/chaff, photo 6. The area leading to the grain unloading area is also stained with green grain dust/chaff, photos 7 and 8. There is loose grain and blue stained ice under the conveyance system, photo 9. I asked Mr. Peterson if he knows how often this area is inspected for storm water. Mr. Peterson stated storm water is not his department.



Observation Area 4 (OA4), Map 1

OA4 is east of the grain receiving area near the stair tower. In this area, a series of hoses are depicted, photos 10, 11 and 12. These hoses are not in containment or identified. It is unknown if they contain pollutants. Mr. Peterson stated that a sump pump had failed. This failure caused the facility to haul solids to the lagoons. Mr. Peterson stated the hoses are associated with pumping activities.

Observation Area 5 (OA5), Map 1

OA5 is the hoop building which is used to store, unbag and clean seed prior to processing. The area outside is stained with green dust/chaff. There is spilled seed, green dust/chaff along the truck path depicted in photos 13, and 14.

Observation Area 6 (OA6), Map 2

OA6 is located on the northwest corner of the northwest lagoon. This area contains an earthen berm which is used to contain runoff water, photos, 15, 16, and 17. There is no evidence of breaching or overtopping. It appears that the level is about half capacity.

Observation Area 7 (OA7), Map 2

OA7 is the air relief valve located along the northwest corner of the south lagoon. There is minor leakage of thin stillage along lagoon liner, photo 18.

Observation Area 8 (OA8), Map 3

OA8 is the east wet cake storage area depicted on Map 3. There are multiple uncontained wet cake piles that contain water accumulation, depicted in photos 19, 20, 21 and 22. The waterway that drains AltEn property meanders east of the wet cake pile and then south through a culvert, photos 23, 24, and 25.

Final Conference and Exit Summary

Following the site visit and tour, we met with Mr. Egr and Mr. Peterson to discuss the findings and provide the exit summary. I expressed concern about general housekeeping and BMPs used to contain runoff, specially the east wet cake pile. I asked Mr. Egr is there is a berm at the east wet cake pile. Mr. Egr stated there is a berm but it is not very tall. We did not observe a berm during the inspection. I stated that hoses needed to be in containment while not in use. Mr. Peterson stated they are using these hoses to transfer solids due to a sump pump failure. I then provided the exit summary and kept a copy for the report/records.

List of concerns and potential violations

Section 5.1 Good Housekeeping Practices

- 1) There are hoses attached to pumps and unattached in various locations. Depending on location, hoses can contain chemical/product. The residual chemical/product could escape into the storm water conveyance system. Facility staff stated the hoses are being used to transfer solids due to a sump pump failure. To prevent leaks, hoses should to be placed in containment between use.
- 2) There is treated seed, green dust/chaff observed on the east side of hoop building. **SWPPP section 4.1, Feedstock Storage state the two-hoop buildings have an “impervious concrete base”, and specifically states that AltEn “minimizes the potential for pollutants from leaving the building by utilizing good housekeeping measures”.**
- 3) In the seed unloading area, there is green dust/chaff staining snow and spilled seed. It is unknown if dust/chaff contain pesticides. There are no best management plan (BMP) installed to prevent dust/chaff or treated seed latent stormwater from entering the waterway. **SWPPP section 5.1 Good Housekeeping Practices states that the facility will “promptly cleanup minor spills and conduct oversight of product transfer”.**
- 4) There are unlabeled chemical totes in various locations. **SWPPP section 5.4 Spill Prevention states that “containers be plainly labeled that could be susceptible to spillage or leakage”.**
- 5) We could not confirm that the east wet cake pile is contained by a berm. The east storage site is located next to a waterway that connects to Clear Creek. **SWPPP section 4.1 Storm Water Generation, wet cake loadout and storage areas states “to prevent any storm water that has contacted WDG from leaving the property, AltEn uses natural topography and has built and maintains earthen berms around these holding areas where necessary to contain any runoff from the WDG.**

Photo Log



Photo 1

Site Visit Report

Observation Area: 1

Date Taken: February 1, 2021

Photographer: Mark Pomajzl

Facility Name/Project Name: AltEn, LCC

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

Direction Facing: West

Description: This photo depicts biochar super sack storage area.



Photo 2

Site Visit Report

Observation Area: 1

Date Taken: February 1, 2021

Photographer: Mark Pomajzl

Facility Name/Project Name: AltEn, LCC

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

Direction Facing: Northwest

Description: This photo depicts biochar super sacks.



Photo 3

Site Visit Report

Observation Area: 1

Date Taken: February 1, 2021

Photographer: Mark Pomajzl

Facility Name/Project Name: AltEn, LCC

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

Direction Facing: Southwest

Description: This photo depicts the recently installed silt fence. The fence is a requirement found in the storm water pollution prevention plan (SWPPP).

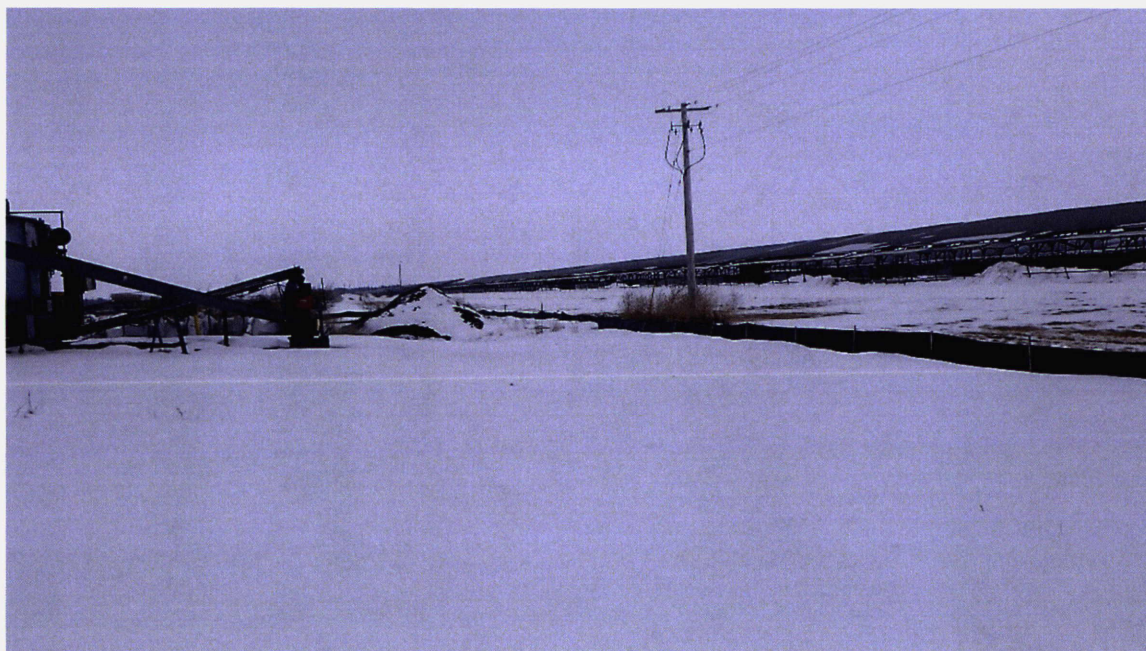


Photo 4

Site Visit Report

Observation Area: 1

Date Taken: February 1, 2021

Photographer: Mark Pomajzl

Facility Name/Project Name: AltEn, LCC

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

Direction Facing: Southeast

Description: This photo depicts the recently installed silt fence southeast of biochar process.

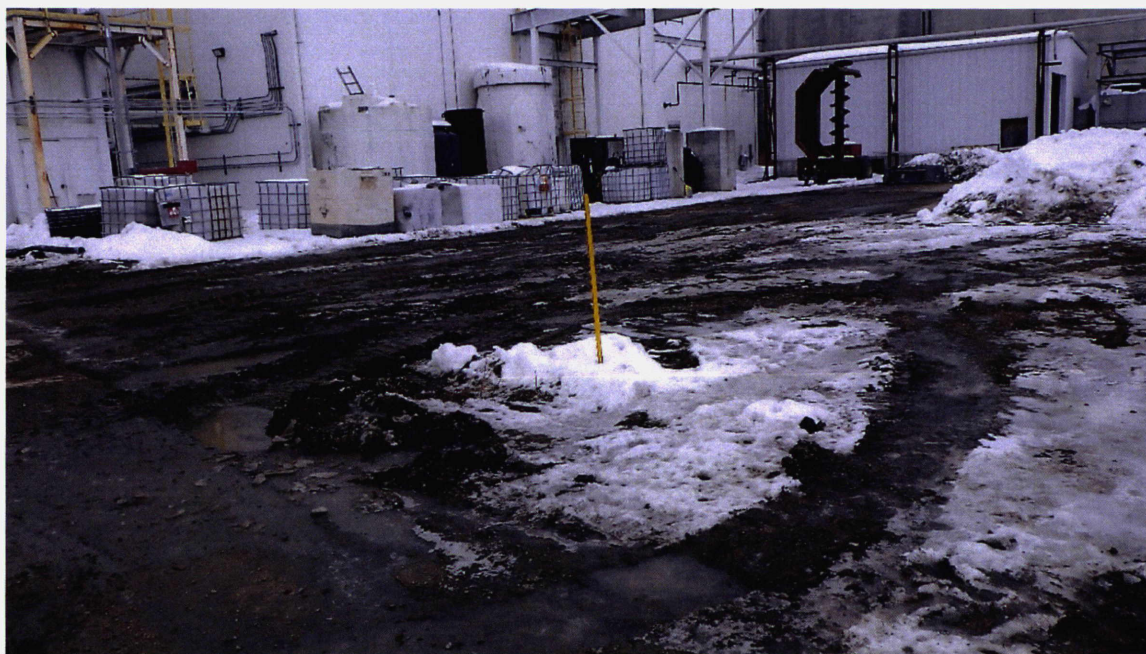


Photo 5

Site Visit Report

Observation Area: 2

Date Taken: February 1, 2021

Photographer: Mark Pomajzl

Facility Name/Project Name: AltEn, LCC

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

Direction Facing: Northeast

Description: This photo depicts unlabeled empty chemical totes. It is unknown if residual chemicals are leaking in the exposed muddy area depicted in the photograph. The SWPPP states that all chemical totes are to be labeled.



Photo 6

Site Visit Report

Observation Area: 3

Date Taken: February 1, 2021

Photographer: Mark Pomajzl

Facility Name/Project Name: AltEn, LCC

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

Direction Facing: North

Description: This photo depicts grain dust staining the a snow bank directly south of the grain unloading area.



Photo 7

Site Visit Report

Observation Area: 3

Date Taken: February 1, 2021

Photographer: Mark Pomajzl

Facility Name/Project Name: AltEn, LCC

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

Direction Facing: North

Description: This photo depicts residual chaff and grain dust. Grain dust and chaff are not considered to be a pollutant of interest in the SWPPP.



Photo 8

Site Visit Report

Observation Area: 3

Date Taken: February 1, 2021

Photographer: Mark Pomajzl

Facility Name/Project Name: AltEn, LCC

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

Direction Facing: Northeast

Description: This photo depicts additional grain dust and chaff near the grain unloading area.



Photo 9

Site Visit Report

Observation Area: 3

Date Taken: February 1, 2021

Photographer: Mark Pomajzl

Facility Name/Project Name: AltEn, LCC

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

Direction Facing: Northeast

Description: This photo depicts loose grain and stained ice under the conveyance system.



Photo 10

Site Visit Report

Observation Area: 4

Date Taken: February 1, 2021

Photographer: Mark Pomajzl

Facility Name/Project Name: AltEn, LCC

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

Direction Facing: Southeast

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 11

Site Visit Report

Observation Area: 4

Date Taken: February 1, 2021

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 coiled black hose (arrow) and unlabeled tote.



Photo 12

Site Visit Report

Observation Area: 4

Date Taken: February 1, 2018

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 long black hose. The hose is not in containment and is unknown if it contains pollutants of concern. The photo also depicts track out of mud which could contain pollutants.



Photo 13

Site Visit Report

Observation Area: 5

Date Taken: February 1, 2021

Photographer: Mark Pomajzl

Facility Name/Project Name: AltEn, LCC

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

Direction Facing: Southwest

Description: This photo depicts green dust/chaff along with spilled seed.



Photo 14

Site Visit Report

Observation Area: 5

Date Taken: February 1, 2021

Photographer: Mark Pomajzl

Facility Name/Project Name: AltEn, LCC

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

Direction Facing:

Description: This photo depicts additional dust/chaff and spilled seed on the east side of the hoop building.



Photo 15

Site Visit Report

Observation Area: 6

Date Taken: February 1, 2021

Photographer: Mark Pomajzl

Facility Name/Project Name: AltEn, LCC

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

Direction Facing: Northwest

Description: This photo depicts the earthen berm constructed to contain runoff from the wet cake pile. There is no evidence of breaching or leaching.



Photo 16

Site Visit Report

Observation Area: 6

Date Taken: February 1, 2021

Photographer: Mark Pomajzl

Facility Name/Project Name: AltEn, LCC

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

Direction Facing: West

Description: This photo depicts the north side of the constructed berm. It is estimated that the berm is approximately half full.



Photo 17

Site Visit Report

Observation Area: 6

Date Taken: February 1, 2021

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 earthen berm looking south along northwest lagoon boundary fence.



Photo 18

Site Visit Report

Observation Area:7

Date Taken: February 1, 2021

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 small leak of thin stillage from the air relief hose entering the south lagoon.



Photo 19

Site Visit Report

Observation Area: 8

Date Taken: February 1, 2021

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 east wet cake pile facing north. In between the pile is accumulated stormwater and snow melt.



Photo 20

Site Visit Report

Observation Area: 8

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 runoff facing south. This water drains south along the south side of the pile to the waterway and culvert.



Photo 21

Site Visit Report

Observation Area: 8

Date Taken: February 1, 2021

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 north side of the wet cake pile. The water in this area drains north along the side of pile to an uncontained area that discharges to a waterway.



Photo 22

Site Visit Report

Observation Area: 8

Date Taken: February 1, 2021

Photographer: Mark Pomajzl

Facility Name/Project Name: AltEn, LCC

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

Direction Facing: Northwest

Description: This photo depicts the southeast side of the wet cake pile. Water has accumulated into small swale. The waterway and containment are depicted on the next photo.



Photo 23

Site Visit Report

Observation Area: 8

Date Taken: February 1, 2021

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 culvert located southwest of the wet cake pile depicted in the previous photos.



Photo 24

Site Visit Report

Observation Area: 8

Date Taken: February 1, 2021

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 location of the wet cake to the waterway. We did not observe a berm in the area depicted by the blue arrow. The red arrow depicts the waterway location.



Photo 25

Site Visit Report

Observation Area: 8

Date Taken: February 1, 2021

Photographer: Mark Pomajzl

Facility Name/Project Name: AltEn, LCC

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

Direction Facing: West

Description: This photo depicts the water way north of the wet cake pile. The arrow depicts AltEn west of this location

AltEn LLC February 1, 2021 Site Visit Map 1



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

0 75 150 300 450 600 750
Feet

NEBRASKA
DEPT. OF ENVIRONMENT AND ENERGY

JW - February 2021

AltEn LLC February 1, 2021 Site Visit Map 2



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

0 105 210 420 630 840 1,050 Feet

NEBRASKA
DEPT. OF ENVIRONMENT AND ENERGY

JW - February 2021

AltEn LLC February 1, 2021 Site Visit
Map 3



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

0 90 180 360 540 720 900 Feet

NEBRASKA
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JW - February 2021

NEBRASKA

DEPT. OF ENVIRONMENT AND ENERGY

Inspection and Assistance Exit Summary

NER 910444

NDEE ID: 84069 NDEE Program & ID: NE0137634 NDEE Notification #: _____

☒ Inspection/Other ☐ Compliance Assistance Visit (CAV) ☐ Permit Assistance Visit (PAV)

Facility/Operation Name: ALLEN Energy

Address _____

City/Town: MEAD, County Sandus, State of Nebraska.

Owner/Occupant/Operator Inspection Contact(s): Ken Pedersen

| Inspector | Phone No | E-Mail address |
|---------------------|---------------------|----------------------------------|
| <u>Mark Pomaizl</u> | <u>402-471-2936</u> | <u>Mark.Pomaizl@nebraska.gov</u> |
| <u>Hilary Spill</u> | <u>402-471-4252</u> | <u>Hilary.Spill@nebraska.gov</u> |

Mailing Address: Department of Environment and Energy, PO Box 98922, Lincoln, Nebraska 68509-8922

Inspection Date: 1-1-21 Start Time: 9:30 End Time: 12:42

☐ No concerns observed ☐ Further agency discussion needed to determine compliance

☒ Concerns observed:

- Housekeeping (Dust, Grain along the grain unloading area)
- Hoses need to be contained (Housekeeping) - Hoses were
being used to transfer from Sump to Vacuum Tanker

☒ Actions to be performed immediately or as soon as reasonably practical:

General Housekeeping

Please notify the Inspector when the above actions are completed.

The Department will provide a final inspection report within an agency average of 14 days of the inspection date. 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 Environment and Energy and your prompt attention to the documented concerns will be considered in assessment of your voluntary compliance. This summary was left

with: Ken Pedersen. Please contact the Inspector if you have any questions concerning this inspection and assistance exit summary.

Mark Pomaizl
Inspector Signature

Signing this document is not an admission of liability by the facility.

Ken Pedersen 2/1/2021
Inspection Contact Signature

revised 11/19/19