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IWM

Haldeman, David

From: Holsten, Jason
Sent: Friday, April 13, 2018 8:01 AM
To: Edwards, Jeffery; Haldeman, David; Macy, Jim; Felix, Carla; Valentine, Kara
Cc: Gidley, Bill; Leibrandt, Morgan
Subject: RE: AltEn Complaint

Great summary. It was alleged a hawk landed on a pile and died, otherwise no other animals died. Facility representatives said there are numerous rabbits that run around the stockpile location and they have not seen any dead rabbits.

The complainant located approximately 5 miles away had dogs that allegedly got sick from eating the material. They took the dogs to the vet who ran toxicity tests and results did not indicate any toxins in the dogs. Mr. Tingelhoff said the facility was willing to conduct additional analysis of the material if there were particular concerns but they have to know what to sample for. He has talked to the complainant and requested the vet records but has not received anything.

Another allegation was that there are local ordinances requiring 24-hour notice to residents before bringing the material to a location for land application and the material has to be incorporated into the soil within 12-hours. All of the facility reps said they were unaware of these ordinances, if that was truly the case, and said they would find out if those requirements were in place.

From: Edwards, Jeffery
Sent: Thursday, April 12, 2018 5:05 PM
To: Haldeman, David; Macy, Jim; Felix, Carla; Valentine, Kara
Cc: Holsten, Jason; Gidley, Bill; Leibrandt, Morgan
Subject: RE: AltEn Complaint

The only thing I can add is that the facility representative stated that no animals, other than the one that reportedly became sick after allegedly eating some of this material, have died or were otherwise affected.

Jeffery L. Edwards
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From: Haldeman, David
Sent: Thursday, April 12, 2018 4:42 PM
To: Macy, Jim; Felix, Carla; Valentine, Kara
Cc: Holsten, Jason; Edwards, Jeffery; Gidley, Bill
Subject: AltEn Complaint



All:

Jeff Edwards, Jason Holsten and I went to the AltEn and met with facility representatives concerning the odor issues reported to our office. The facility representatives we met with were Jim Stewart-Vice President and Plant Manager, Scott Tingelhoff-Legal and Regulatory Compliance, Dean Egr-ADNR Manager/Assistant Production Manager, and Mary Tingelhoff-Environmental Health and Safety. Jason is out of town next week however will have his report completed the following week.

In short, we observed no regulatory violations associated with the facility. Based upon our conversations with the facility representatives, we believe the odors of concern are coming from the locations where the wet cake is being land applied on farm fields. The facility uses the terms "wet cake" and "wet distiller's grain" interchangeably. The material is given or sold to farmers for its nutrient value. Farmers typically have an ag company test their soils to determine the correct amount of fertilizer to apply to a field. In the use of wet cake, the farm soil is sampled to determine soil conditions and the wet cake is sampled to determine the nutrient value. These values are then used to determine the appropriate application rate of the wet cake.

The wet cake is a byproduct of ethanol production. AltEn has three management options for this material after the liquids are removed (the liquids are sent to an on-site anaerobic digester.) These options (in the facility's order of preference) are:

1. Process the wet cake through their biochar system;
2. Provide the wet cake to farmers for land application; and,
3. Compost the wet cake and then distribute the finished compost as a soil amendment.

In August of 2007 the Department issued a compost site permit to E3 Bio Fuels. The permit was later transferred to AltEn. In February of 2017 the Department approved a major modification of the permit to enable the facility to accept other types of materials to be used as a carbon source for the compost process. However, the facility did not accept any other carbon sources pursuant to the modified permit. Active composting has not occurred at the site since July of 2017. None of the wet cake that was placed at the compost site was actually composted. There were issues associated with the compost pad so the material was removed from the pad and stockpiled on the AltEn property north of their office building. The amount of material moved north of the property was approximately 26,000 cubic yards. Some of the wet cake that was moved is approximately 2 years old because there was never any active composting of the material.

Because the material was moved from the compost site and it appeared the facility was not managing it we issued a letter of warning that cited illegal disposal and a subsequent schedule was established to remove it by August 15th of this year. The facility was also required to submit monthly reports on their management efforts. Initially the facility did not submit the required reports; however on April 3rd they submitted a report that summarized the customer, disposition, and amount of material removed dating back to December 14, 2017. Based upon the facility report and our on-site observations today it is apparent that the facility has made progress on removing the material. Most of what has been removed has been land applied; a much smaller quantity has been processed through their biochar system. The facility has experienced some delay in removal of the material due to weather conditions that affect land application and, some malfunctioning of the biochar system.

Other items of interest:

- The source of the wet cake is only from the ethanol plant located on-site.
- The land application site where it has been reported that a dog died after being exposed to the material is approximately 5 miles from the facility.
- The ethanol plant went back into operation two days ago and will be producing wet cake again.
- Stockpiled in the general location is wet cake not associated with the compost site.
- Mead cattle is not composting their routine mortalities. Those cattle are being sent off for rendering.
- At this time the facility has no intention of starting up the compost facility again.

- The facility representatives indicate that they have not received any complaints regarding odor and was not represented at the village board meeting held on Tuesday of this week.
- The facility would be willing to discuss specific issues with interested parties.
- The facility is now experiencing some hesitancy by farmers to utilize the material due to the odor issue.

Cut and pasted below is information on biochar I found from Wikipedia.

Jeff and Jason, if I have misstated or you would like to add anything please let me know.

Dave

From Wikipedia, the free encyclopedia
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A piece of biochar

Biochar is charcoal used as a soil amendment. Biochar is a stable solid, rich in carbon, and can endure in soil for thousands of years.^[1] Like most charcoal, biochar is made from biomass via pyrolysis. Biochar is under investigation as an approach to carbon sequestration.^[1] Biochar thus has the potential to help mitigate climate change via carbon sequestration.^{[2][3][4]} Independently, biochar can increase soil fertility of acidic soils (low pH soils), increase agricultural productivity, and provide protection against some foliar and soil-borne diseases.^[5]

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