



AltEn, LLC

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Nebraska Dept of Environmental Quality
By: _____ DEQ# 171 _____

Alan Aanerud
Nebraska Department of Environmental Quality
Wastewater Division - Permitting
1200 'N' St.
P.O. Box 98922
Lincoln, NE 68509

June 26, 2012

RE: AltEn, LLC NPDES Permit
Permit No. NE0137634
IIS File No. PCS 84069-P

Mr Aanerud,

This letter is a request to modify the existing NPDES permit assigned to AltEn, LLC. The modification requested is to include additional information pertaining to the discharge stream to Outfall 002.

Per my discussion with Reuel Anderson on 6/22/12, AltEn is currently reviewing the feasibility of utilizing discarded "treated" seed in the ethanol production process in addition to and/or in lieu of traditional grain feedstock. The discarded seed is considered a waste to seed manufacturers as it no longer passes germination testing standards and therefore can no longer be sold as seed in the agricultural market. The majority of the discarded seed will be treated with herbicides and pesticides prior to AltEn taking possession. MSDS sheets will be provided by all seed suppliers with the specific chemical treatments applied.

The process at the AltEn facility will remain unchanged with the use of discarded seed as feedstock, with the exception of the wet distillers grain (WDG) will no longer be sent to the adjacent feedlot as the chemical treatments render the WDG un-suitable for livestock feed. The WDG will be combined with the thin stillage and processed in the anaerobic digesters for biogas production. The effluent from the digesters will continue to be discharged to Outfall 002 as land application/soil supplement.

The revisions requested pertain to Part III – Effluent Land Application Requirements – Outfall 002 and 003; Subpart A – General Land Application Requirements. Per discussions with the seed manufacturer's, testing will be required to meet EPA and Federal Seed Act (FSA) requirements for analysis of effluent and levels of chemicals present in land application discharge. Per the EPA and FSA, land application is one of the acceptable means of disposal of the material. The existing requirements





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listed in the NPDES permit for land application is *"Part III; Subpart A as #4 – The application rate is limited to the agronomic rate of Nitrogen."* AltEn requests to add additional verbiage to include *"The application rate is limited to the more stringent of either 1) agronomic rate of Nitrogen or 2) loading rate of chemical concentration per EPA and/or seed supplier guidelines."*

In addition, Part III; Subpart D – Annual Reporting Requirements will include an annual report of chemical seed treatments applied to the discarded seed, with accompanying MSDS sheets, used as feedstock in the ethanol production process.

Any chemicals deemed as toxic pollutants by the NDEQ, EPA, FSA or seed manufacturer's will be tested, analyzed and reported in accordance with NPDES permit Appendix A, NPDES Attachment 1, *Sampling and Analysis Requirements for Process Wastewater Discharges for the NPDES Permit Renewal Application* and NPDES Attachment 2, *Sampling Analysis for Non-Process Wastewater Discharges for the NPDES Permit Renewal Application*.

If you have questions regarding this matter, please feel free to contact me at (702) 561-1022.

Sincerely,

Tanner L. Shaw, PE, LEED AP
Project Manager

cc: Reuel Anderson, NDEQ