Message

From: Green, Jamie [Green.Jamie@epa.gov]
Sent: 4/23/2019 10:20:10 PM
To: Smith, John [Smith.John@epa.gov]
CC: Weekley, Erin [weekley.erin@epa.gov]; Singletary, DeAndre [Singletary.DeAndre@epa.gov]; Cozad, David [Cozad.David@epa.gov]; Rosado-Chaparro, Wilfredo [Rosado-Chaparro.Wilfredo@epa.gov]; Breedlove, Dan [Breedlove.Dan@epa.gov]; Muehlberger, Christopher [muehlberger.christopher@epa.gov]
Subject: Re: AltEn update

That's our understanding

Sent from my iPhone

On Apr 23, 2019, at 5:02 PM, Smith, John <Smith.John@epa.gov> wrote:

This was never sold as wet distillers grain for livestock feed, at least?

From: Weekley, Erin
Sent: Tuesday, April 23, 2019 4:20 PM
To: Singletary, DeAndre <Singletary.DeAndre@epa.gov>; Smith, John <Smith.John@epa.gov>; Cozad, David <Cozad.David@epa.gov>
Cc: Rosado-Chaparro, Wilfredo <Rosado-Chaparro.Wilfredo@epa.gov>; Breedlove, Dan <Breedlove.Dan@epa.gov>; Muehlberger, Christopher <muehlberger.christopher@epa.gov>; Green, Jamie <Green.Jamie@epa.gov>
Subject: AltEn update
Importance: High

DeAndre, John, Dave:

We are continuing to work to better understand the situation at the AltEn ethanol plant. Given the scheduling issues today, we wanted to provide an update via email.

Background, much of this taken directly from NDA's summary:

- AltEn is an ethanol plant in Mead, NE. It uses discarded treated seed (mostly corn but also some grain sorghum) as a carbohydrate source. The resulting fermentation results in ethanol sold as a fuel additive and "wetcake" solids that are then distributed as a wetcake soil conditioner that is land applied to farm fields. The wetcake biosolids are heavily contaminated with pesticide residues.

- The plant started generating ethanol using treated seed on January 9, 2015, and accumulated the wetcake solids for three years before deciding to land apply it as a soil conditioner. Because the wetcake had been stockpiled for over three years without further conditioning, it developed an overwhelming odor that quickly resulted in citizen complaints whenever it was applied in a field near an occupied structure. Those odor complaints started in spring of 2018, shortly after the wetcake was being moved to the field and land applied. The odor complaints were received every time the company land applied more product with a significant number of complaints filed between the end of December 2018 and early March 2019. NDA became involved in the situation on January 28, 2019.

- An unofficial sample of wetcake that had been moved to a field but not yet land applied was collected by the NDA on 1-29-19 and tested for neonicitinoid, pyrethroid and organophosphate

insecticides, and strobilurin and triazole fungicides. Four fungicides, three insecticides and one herbicide were detected and reported by the lab on March 1, 2019. NDA then decided to collect an official sample on March 29, 2019 of fresh wetcake collected immediately after the fermentation process and before moving the material to stockpile storage. **The lab analysis was reported on April 19, 2019 with significant concentrations of the following pesticides reported: azoxystrobin, clothianidin, fludioxonil, metalaxyl, prothioconazole, tebuconazole, thiamethoxam and trifloxystrobin, and a low concentration of imidacloprid and selenium (this is the only heavy metal reported as detected). Clothianidin (neonic insecticide) topped the chart at 427,000 ppb. NDA's calculation has a land application rate of 20 tons per acre resulting in 17 pounds of active ingredient per acre for that compound. The seed treatment labels indicate the annual maximum amount allowed at 0.165 pounds per acre.**

Coordination with the state:

- We have been discussing the situation with both NDA and NDEQ, separately.
- There appears to be a high level meeting between NDA and NDEQ May 3.

Ex. 5 Deliberative Process (DP)

Ex. 5 AC / Ex. 7(A)

Other considerations:

- This facility employs approximately 200 people

Please let us know if we can provide additional information or a more formal briefing.

Erin Weekley
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