



REGION 5

CHICAGO, IL 60604

SUBJECT: CLEAN AIR ACT INSPECTION REPORT
Al-Corn Clean Fuel, LLC, Claremont, Minnesota

FROM: Charles Hall, Environmental Engineer
AECAB (MN-OH)

THRU: Brian Dickens, Section Chief
AECAB (MN-OH)

TO: File, Al-Corn Clean Fuel, LLC, Claremont, Minnesota

BASIC INFORMATION

Facility Name: Al-Corn Clean Fuel, LLC (Al-Corn)

Facility Location: 797 5th Street, Claremont, Minnesota

Date of Inspection: 27 August 2024

EPA Inspector:

1. Charles Hall, U.S. EPA, Region 5, ECAD, AECAB, MN-OH Section

Other Attendees:

Jon Holland, Pinnacle Engineering
Bob Neuman, Plant Manager
Mike Rutledge, EHS Manager
Ben Smith, Production Manager

Contact Email Address: bneuman@al-corn.com

Purpose of Inspection: CAA 112(r) inspection

Facility Type: ethanol plant

Regulations Central to Inspection: 40 C.F.R. Part 68

Arrival Time: 08:30 a.m. CDT

Departure Time: 11:30 a.m. CDT

Inspection Type:

- ☐ Unannounced Inspection
- ☒ Announced Inspection

PRE-INSPECTION REQUESTED DOCUMENTS

Before the inspection, the inspector requested and reviewed documents in the following categories:

1. Management structure in terms of RMP and who has responsibility for the different program elements and how that is documented;
2. Off-site Consequence Analysis supporting documentation;
3. Process Safety Information;
4. Process Hazard Analysis;
5. Operating Procedures specific to the covered process;
6. Lockout/Tagout procedures;
7. Training documentation on employees who operate and maintain the covered process;
8. Mechanical Integrity program procedures;
9. Management of Change written procedures;
10. Pre-Startup Safety Reviews completed in the covered process areas;
11. Compliance Audits, the two most recent audits, audit reports, findings of the audits, and how these findings have been resolved or corrected. (if applicable);
12. Incident Investigations performed for each of the covered processes, reports from the investigations, documentation on how the report findings and recommendations were addressed and resolved;
13. Employee participation plan of action regarding the implementation of the employee participation;
14. Hot work permit program/policy, examples of active permits issued for the processes;
15. Contractor policy, a list of contractors who have worked on or near the covered processes within the past two years, documentation on the safety performance and programs evaluated when selecting a contractor, work practices that control the entrance/exit or presence of contractors, documentation on how applicable provisions of the emergency response program are explained to contractors; and
16. Emergency Response Plan or Emergency Action Plan.

OPENING CONFERENCE

- ☒ Presented Credentials
- ☒ Stated authority and purpose of inspection.
- ☒ Provided Small Business Resource Information Sheet
- ☐ Small Business Resource Information Sheet not provided because Al-Corn is not a Small Business.
- ☒ Provided CBI warning to facility.

The following information was obtained verbally from the facility representatives.

Process Description:

Al-Corn blends denaturant (a mixture of butane, pentane, and isopentane) with the ethanol that Al-Corn produces. Al-Corn no longer uses ammonia in the ethanol production process. Al-Corn has two tank farms with either one or two tanks for denaturant.

Staff Interview: The staff interview used the RMP Program Level 3 Process Checklist as an outline and focused on questions B16 and B23, D3, D4, D5, D11, D15, D19 through D22, D24, D26 through D34, D36 through D39, D58 through D61, Section E, G2, G3, G7, and H2. The documents that Al-Corn provided in advance of the inspection answered the remaining questions.

TOUR INFORMATION

EPA Toured of the Facility: Yes.

Data Collected and Observations: The RMP Program Level 3 Process Checklist summarizes the observations of whether Al-Corn has the required documents in its Risk Management Plan. In each tank farm, the inspector walked the denaturant process from the receiving bulkhead through the receiving and unloading pipe racks, and storage tank(s). Al-Corn maintains all records including piping and instrumentation diagrams, operating procedures, training records, and safety data sheets electronically. The inspector reviewed these documents and the other documents listed above during the records review.

Photos were taken during the inspection.

Field Measurements were not taken during the inspection.

CLOSING CONFERENCE

- ☒ Provided U.S. EPA point of contact to the facility.

Additional Requested documents:

During the inspection, the engineer requested the following additional documents:

- Example training records for the denaturant process
- Example thickness testing report for each recognized and generally accepted good engineering practices.

During the inspection, the engineer asked the Al-Corn representatives to segregate previously submitted documents with CBI from those without CBI.

Compliance Assistance: The inspector did not provide compliance assistance.

Concerns: The inspector did not identify deficiencies or concerns.

DIGITAL SIGNATURES

Report Author: **CHARLES HALL**  Digitally signed by CHARLES HALL
Date: 2024.09.05 14:53:28 -05'00'

Section Chief: **BRIAN DICKENS**  Digitally signed by BRIAN DICKENS
Date: 2024.09.05 15:14:11 -05'00'

Facility Name: Al-Corn Clean Fuel, LLC
Date of Inspection: 27 August 2024

Facility Location: 797 5th Street, Claremont, Minnesota

APPENDIX A: DIGITAL IMAGE LOG

Photographer: Charles Hall Camera: Olympus TG-6 #1 EPA Bar Code: SZ4061

File Name	Date and Time	Description of Image
P8270013.jpg	08/27/24 10:22	Denaturant unloading bulkhead overview for south tank farm
P8270014.jpg	08/27/24 10:23	Ethanol unloading connection detail for south tank farm
P8270015.jpg	08/27/24 10:23	Denaturant unloading bulkhead detail for south tank farm
P8270016.jpg	08/27/24 10:25	Warning sign for truck drivers
P8270017.jpg	08/27/24 10:28	Pipe rack from bulkheads to, among other things, the denaturant tank in the south tank farm
P8270018.jpg	08/27/24 10:30	4-inch pipe on left receives into the denaturant tank 4-inch pipe on right (lower level) feeds from the denaturant tank
P8270019.jpg	08/27/24 10:31	Denaturant pump in the south tank farm
P8270020.jpg	08/27/24 10:34	Tank T-7250 tank and piping in the south tank farm
P8270021.jpg	08/27/24 10:40	Tank T-802 tank in the north tank farm
P8270022.jpg	08/27/24 10:44	Tank T-802 and Tank T-805 receiving bulkhead in the north tank farm
P8270023.jpg	08/27/24 10:45	Warning sign in the north tank farm
P8270024.jpg	08/27/24 10:48	Tank T-802 overview in the north tank farm
P8270025.jpg	08/27/24 10:52	4-inch pipe receiving into Tank T-802 in the north tank farm
P8270026.jpg	08/27/24 10:53	Tank T-805 in the north tank farm has one 4-inch pipe to receive denaturant into and feed out of the tank. A block valve in the lower right corner of the photograph is closed when receiving denaturant but opened when unloading denaturant.