

7555 E. Hampden Ave., Suite 520 Denver, Colorado 80231 Telephone: (303) 830-3939

June 25, 2018

Reuel Anderson Unit Supervisor – Permits Nebraska Department of Environmental Quality 1200 "N" Street Suite 400, The Atrium Lincoln, NE 68509

Dear Mr. Anderson;



As outlined in Operating Permit No: (NEO111686) Western Sugar Cooperative's Scottsbluff, Nebraska facility is requesting review and approval from the Nebraska Department of Environmental Quality (NDEQ) to begin on a piloted trial basis and upon successful review post trial basis the continuation as needed of the below listed algae and odor treatment products at our Scottsbluff facility.

Interox® Food Grade 34% Hydrogen Peroxide will be added via a submersible pump addition to wastewater lagoons, evaporative ponds and mud ponds to assist with algae reduction and odor control. The addition of Interox® Food Grade 34% Hydrogen Peroxide is used as an oxygen additive within the wastewater lagoons and outfall ponds therefore, creating an aerobic environment which disallows the growth of anaerobic bacteria.

Phycomycin will be added via a broadcaster or spreader to Condenser Ponds to assist with algae reduction. Phycomycin is a sodium carbonate peroxyhydrate oxidizing agent used for the control and elimination of algaecide blooms. Western Sugar Cooperative's Operator of Responsible in Charge, Sean Dibble with Alberts Water and Waste Water Supply has used Phycomycin to control algae blooms in several drinking water tributaries and water bodies in Colorado with great success.

With the NDEQ's approval, Western Sugar Cooperative under the direction of our Operator of Responsible in Charge, Sean Dibble will begin on a limited and controlled piloted trial basis and upon successful review post trial basis the continuation as needed of Phycomycin and Interox® Food Grade 34% Hydrogen Peroxide.

Attached please find the Interox® Food Grade 34% Hydrogen Peroxide and Phycomycin safety data sheets (SDS) for your review and records.

If you have any questions, please contact Josh Livingston – Cooperative Director of Environmental at (303) 813-3576.

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Base on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

Sincerely,

Jeff Kava Factory Manager

Kava 6-25-18

Cc: S. Dibble, AWWS Cc: John Flint, NDEQ Cc: P. Ducey, NDEQ 201,80045467