

ACK-60

CROP TECH SERVICES, INC.

6801 Ely Road SW
Cedar Rapids, IA 52404

Telephone 319-848-7424
800-727-2688

Con 12-1-1
Doc # 32408

Mr. Matt McDonald
Energy & Waste Management Bureau
Iowa Department of Natural Resources
502 East 9th Wallace Bldg.
Des Moines, IA 50319

September 26, 2008

RE: Permit # 43-SDP-08-00P-LAN

Dear Mr. McDonald;

As per the condition of this permit, an annual site inspection for 2008, of land being used for application of biomass material coming from Cargill North American Corn Sweeteners of Blair, NE is to be done.

I made the site inspection on September 26, 2008. I met with Mr. John Miller and Mr. Chad Brodersen of Cargill North American Corn Sweeteners to review the land application of plant by-product.

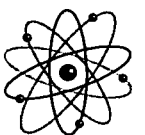
There had been no formal complaints filed by the public in the past year 2008, either directly to Cargill or the IDNR.

There have been no registered spills of bio-mass material at the loading site at the plant, in transit, or in the field in 2008.

As required a review of the training on the "Emergency Response & Remedial Action Plan" with all necessary staff of Cargill North American Corn Sweeteners and Chamness Technology (contractor for field application). In the event of a plant spill, in-field application spill or transfer hose break, a detailed emergency response procedure is reviewed. All staff attending this training must sign a document that states they understand and will follow the intended plan and make the necessary contacts to the right individuals listed in the "Emergency Response Plan".

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• CROP MONITORING • GRID SOIL SAMPLING WITH GPS •
• COMPUTER PROGRAMS • CONTRACT RESEARCH •



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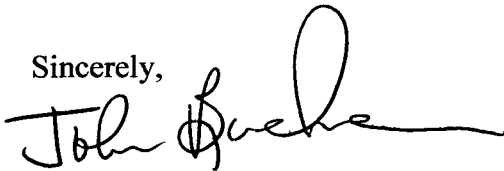
In addition, I made an in-field inspection of the application process and was joined by Mr. Lon Lusher of Chamness Technology, Inc. (Contractor for the field application). The method of land application is a track wheel drive tractor with a 7500 gallon tank with an injection toolbar. Tanker trucks were being used to transport the bio-mass product from the plant to the field.

To date, in 2008 there had only been 2 fields that had Cargill bio-mass applied in Iowa. Upon review and to the best of my ability determined that these applications were being done in accordance with the issued permit.

In summary, to the best of my ability, determined that the land application of the Bio-mass material from Cargill North American Corn Sweeteners is in compliance with the issued permit .

In the future, because of the change made in the classification of the Cargill bio-mass Material, to a soil amendment this agronomic review might not be nessary. Land applications will be made under a registered product named "Virgornomics B", approved By the Iowa Dept of Agriculture in a letter dated February 29, 2008.

Sincerely,

A handwritten signature in black ink, appearing to read "John Buchanan". The signature is fluid and cursive, with a large loop at the end.

John Bradley Buchanan CCA
Iowa CCA # 21693
President, Crop Tech Services, Inc.
6801 Ely Rd SW
Cedar Rapids, IA 52404
319-848-7424

cc: Michelle Bucklin –Cargill North American
John Miller- Cargill North American
Dani Murphy – Chamness Technology