

CASE REVIEW MEMORANDUM

Altona Chemical Company — Northern Operations Review

State File	NDDEQ-EE-26-031
Date	27 April 2026
Prepared For	Director, Environmental Enforcement Division
Participating Units	Environmental Enforcement; Water Quality; Hazardous Waste Program; North Dakota BCI Liaison
Local Contacts	Bismarck Environmental Police; county sheriffs; cross-border complaint desk
Issue	Accumulated allegations of dumping, storage irregularities, and manifest manipulation.

OPEN CASE NOT FOR PUBLIC RELEASE

Background

Citizen complaints, inspector referrals, and interagency correspondence have placed Altona's northern operations under sustained scrutiny. While much of the company's statewide activity appears licit, a narrower group of facilities continues to generate disproportionate concern.

Patterns include unexplained tanker movement during overnight hours, unusual profitability in waste-disposal accounts, and site managers who insist that disposal-routing decisions are handled off-site or through counsel.

Investigative Notes

- A former dispatcher alleged that 'premium customers' received off-book pricing supported by diverted disposal costs.
- A sampling contractor described being denied access to one siding immediately after visible staining was noted.
- Field officers logged repeated references to attorney **Seth Jenkins** before inspectors could complete routine follow-up requests.
- Financial reviews identified several small transport entities with limited equipment but unusually large payments.
- Two reports referenced potential bribery of border-related personnel; these allegations remain unproven.

Conclusion

The current file supports probable regulatory concern and justifies continued monitoring, but it remains short of a complete prosecutable chain tying executive leadership to each suspected act. Preservation of manifests, dispatch records, and vendor ledgers should remain the division's priority.

Action

Maintain open case status; share selected findings with EPA and FBI; re-contact complainants; and flag any new tanker incidents involving wells, drainage areas, rural access roads, or inactive rail sidings.

FICTIONAL MDU RECORD