



Valent BioSciences LLC  
2142 350th Street  
Osage, IA 50461  
Phone: 641-832-2384

**Date:** August 7<sup>th</sup> 2025

**To:**

Theresa Stiner, CPM  
Environmental Specialist Senior  
Solid Waste and Contaminated Sites Section  
Iowa Department of Natural Resources  
6200 Park Ave. Ste 200  
Des Moines, IA 50321  
[Theresa.Stiner@dnr.iowa.gov](mailto:Theresa.Stiner@dnr.iowa.gov)

**Subject: Letter of Intent – Request for Permit Amendment to Include New Waste Stream Containing Soybean Oil**  
**Permit No.: 66-SDP-06-16P**

Dear Ms. Stiner,

Valent BioSciences LLC is submitting this letter of intent to formally request an amendment to our existing land application permit (Permit No. 66-SDP-06-16P) to include a new waste stream that may contain residual amounts of edible soybean oil.

**Background**

As part of our fermentation-based manufacturing process at our Osage facility, we are in the process of introducing a new product formulation that includes food-grade soybean oil. Under normal operating conditions, this oil is consumed during fermentation; however, in cases of off-specification or dumped batches, residual oil may remain present in the resulting sludge sent for land application.

**Proposed Waste Stream Characteristics**

- **Source:** Fermentation process residuals and potential dumped batches

- **Component of Concern:** Edible soybean oil (USP/Food grade)
- **Expected Occurrence:** Intermittent; only when off-spec batches require disposal
- **Estimated Volume:** Minimal increase from current sludge volume; data will be provided upon request
- **Testing and Monitoring:** We will continue to test for all parameters required under IAC 567-121 and include any specific analyses recommended by DNR related to oil content or land impact.

### **Justification**

Based on our review of IAC 567-121 and recent communication with your office, we understand that the inclusion of edible soybean oil does not inherently pose an environmental concern. We wish to ensure full compliance and transparency by requesting this amendment before proceeding with any land application of waste containing this material.

### **Next Steps**

Please advise if any additional documentation or sampling data is required to support the review process. We are prepared to provide full analytical characterization of the modified waste stream and coordinate with our agronomist, Mr. Frank Moore (Three Rivers Ag Consulting), to update our nutrient management plan accordingly.

Thank you for your guidance and continued support. We look forward to working with your team on this amendment and will await your response.

Sincerely,

**Hessam Daneshvar, MSc., CLSSBB** | Sr. Quality Manager

2142 350th Street | Osage, IA 50461

Office: 641-832-3667 | Mobile: 515-230-3424

Email: [Hessam.Daneshvar@valentbiosciences.com](mailto:Hessam.Daneshvar@valentbiosciences.com)

Website: [www.valentbiosciences.com](http://www.valentbiosciences.com)