



August 17, 2023

Anna R. Landis  
Office of Regional Counsel  
United States Environmental Protection Agency, Region 7  
11201 Renner Blvd  
Lenexa, Kansas 66219  
Email: Landis.Anna@epa.gov

RE: Supplemental Environmental Projects (SEP) Proposal  
Red Star Yeast Co. 950 60<sup>th</sup> Ave S.W., Cedar Rapids, Iowa 52404  
RCRA ID Number: IAR00505669

Dear Ms. Landis:

On January 23<sup>rd</sup>, 2023, the U.S. Environmental Protection Agency, Region 7 (EPA) conducted an inspection of the Red Star Yeast Co. facility located at 950 60<sup>th</sup> Ave S.W. in Cedar Rapids, Iowa to determine compliance with the requirements of the Resource Conservation and Recovery Act (RCRA). The inspection identified certain alleged violations of RCRA. Pursuant to EPA's pre-filing letter transmitted July 5, 2023, our settlement discussions via telephone on August 2, 2023, and your email dated August 2, 2023, EPA proposes settling the alleged violations and offered Red Star Yeast the opportunity to propose a Supplemental Environmental Project (SEP) as part of the final settlement of this matter.

In response to the foregoing, Red Star Yeast is proposing the following SEP. The Cedar Rapids Fire Department (CRFD) has a Hazardous Materials team that would respond to hazardous waste incidents at the Cedar Rapids facility, including potential spills from the containers or tanks identified as part of EPA's inspection. CRFD is interested in participating in the SEP. CRFD leadership personnel have prepared the below list of equipment that would aid in their response to a hazardous waste or other chemical incident, including potential spills or releases. The table below details the equipment request, quantity, unit cost, and total cost. Red Star proposes acquiring and providing this equipment to CRFD for the SEP.

Item	Supplier	Quantity	Unit Cost	Total Cost
Dupont Encapsulated suit Tychem 10000, Front Entry, Taped Seam, Size XL MFG Model: TK554TLYXL000100	Grainger	1	\$ 2,012.00	\$ 2,012.00

**\*Settlement Communication FRE 408\***

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Red Star Yeast Company LLC

950 60<sup>th</sup> Avenue SW  
Cedar Rapids, IA 52404  
<http://www.redstaryeast.com/>  
(319)896-2600



Item	Supplier	Quantity	Unit Cost	Total Cost
Dupont Encapsulated suit Tychem 10000, Front Entry, Taped Seam, Size 2XL MFG Model: TK554TLY2X000100	Grainger	1	\$ 2,130.00	\$ 2,130.00
Milwaukee M18 ROCKET Cordless 6000 lumen Tower Light	Grainger	2	\$ 459.00	\$ 918.00
M18 batteries (2 pack 6 Ah)	Grainger	2	\$ 347.00	\$ 694.00
Milwaukee multi-port charger	Grainger	1	\$ 180.00	\$ 180.00
Battle Zero-MOD Waterproof Tactical Bone Conduction Headset with MC4 connector	coderedheadsets.com	2	\$ 139.00	\$ 278.00
Assault-MOD Waterproof Tactical Throat Mic Headset with MC4 connector	coderedheadsets.com	2	\$ 143.00	\$ 286.00
Bullard TXS Thermal Imaging Camera Package	firesafetyusa.com	1	\$ 3,495.00	\$ 3,495.00
Spilfyter Chemical Classifier Strips (10 pack)	Grainger	2	\$ 148.00	\$ 296.00
Dunlop Hazmat PVC Knee boots, green (Size 11, 13, and 15)—2 pair of each size	Grainger	6	\$ 145.00	\$ 870.00
100 gallon tank trap – super duty	Andax.com	2	\$ 295.00	\$ 590.00
50 gallon tank trap – super duty	Andax.com	2	\$ 246.00	\$ 492.00
Andax Industries MM25-3 Multi-Manifold	Andax.com	1	\$ 654.00	\$ 654.00
Craftsman 102-piece household tool set with hard case	Lowes.com	1	\$ 100.00	\$ 100.00
Craftsman 298-piece SAE/metric mechanics tool set	Lowes.com	1	\$ 370.00	\$ 370.00
Craftsman 2000 series 26Wx19.75H 5-drawer tool chest	Lowes.com	1	\$ 224.00	\$ 224.00
MultiRAE Pro sensor cover assembly with pump (M01-3003-100)	Clarey's Safety Equipment	1	\$ 427.00	\$ 427.00
MultiRAE Pro Gamma sensor (C03-0986-000)	Clarey's Safety Equipment	1	\$ 1,590.00	\$ 1,590.00
MultiRAE Pro Extended Duration Li-ion battery (M01-3055-000)	Clarey's Safety Equipment	1	\$ 515.00	\$ 515.00
MultiRAE Pro 10.6 ev ppb PID lamp (C03-0912-001)	Clarey's Safety Equipment	1	\$ 1,118.00	\$ 1,118.00
			<b>Total</b>	<b>\$ 17,239.00</b>

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Based on Red Star's review of the EPA SEP Policy 2015 Update,<sup>1</sup> Red Star believes that the proposed SEP meets applicable requirements and guidelines, including having a sufficient nexus and relationship between the alleged violations and the proposed SEP. Red Star also is willing to work cooperatively with EPA and the proposed SEP recipient, CRFD, to ensure that any other SEP requirements and certifications are satisfied. For successful implementation of the SEP, Red Star respectfully requests a reduction of the total proposed penalty amount in any settlement with EPA by 80% of the total SEP costs, which is in line with the EPA SEP Policy 2015 Update.

Based on the foregoing, Red Star Yeast Co. submits this SEP proposal to EPA for its review and approval.

If you have any questions or concerns, please contact Scott Groth.

Respectfully submitted,

Scott Groth  
Email: [s.groth@lesaffre.com](mailto:s.groth@lesaffre.com)  
EHS Manager  
Red Star Yeast Co.

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<sup>1</sup> See <https://www.epa.gov/sites/default/files/2015-04/documents/sepupdatedpolicy15.pdf>.

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