



# SAF (USA) CORPORATION



**CERTIFIED MAIL NO. 7000 0600 0026 5619 0961**  
**Return Receipt Requested**

July 24, 2001

Director of Compliance and Enforcement  
Bay Area Air Quality Management District  
939 Ellis Street  
San Francisco, CA 94109  
ATTN: Title V Reports

**RE: Major Facility Review Permit. Semi-annual Monitoring Report, 1/1/01 – 6/30/01**

Facility #A3523  
Red Star Yeast  
A division of Universal Foods Corp.  
1384 Fifth Street  
Oakland, CA 94607

Facility #B2975  
Red Star Yeast  
Lesaffre Yeast Corporation  
1384 Fifth Street  
Oakland, CA 94607

Dear Sir or Madam:

As reported to Mr. Victor Morales-Laimon of the Bay Area Air Quality Management District on February 26, 2001 (see enclosed), operational responsibility for the Red Star Yeast facility in Oakland, CA changed from Universal Foods Corporation to Lesaffre Yeast Corporation on February 23, 2001. The District then changed the facility identification number from A3523 to B2975. The enclosed Semi-annual Monitoring Report that is required by Condition I.F. of the Major Facility Review Permit for the facility covers the entire period 1/1/01 through 6/30/01 during which both Universal Foods Corporation (now Sensient Technologies Corporation) and Lesaffre Yeast Corporation had operational responsibilities. Please note that the person whose signature appears at the bottom of this report, Mr. William Tesch – Vice President, Operations, was the Responsible Corporate Official for the facility under its operation by Universal Foods Corporation and remains the Responsible Corporate Official for the facility under its operation by Lesaffre Yeast Corporation.

## **PERMIT CONDITIONS**

### **Section VI.A. Condition #12754 Yeast Fermenter Exhaust**

Requirement: Item #1 limits the total carbon concentration in the exhaust gas from sources S-3, S-4, S-5, S-6, and S-7.

Monitoring Summary: There were no instances of non-compliance with the total carbon concentration limits during the period.

Requirement: Item #2 requires that steps be taken to reduce or contain odors that cause an off-property nuisance.

Monitoring Summary: There were no instances where an off-site property nuisance, as defined by District regulations, was created and thus there was no non-compliance with this condition.

Requirement: Item #3.a. requires that the exhaust gas total carbon concentration shall be recorded, using a District approved monitor, at least once per hour during each fermentation batch. This information shall then be used to calculate the average carbon concentration for the batch. This applies to sources S-3, S-4, S-5, S-6, and S-7.

Monitoring Summary: The required monitoring was conducted for each yeast fermentation batch. The list of batches is enclosed herein, but is considered Confidential Business Information by Red Star who requests that the District treat it as such.

Requirement: Item #3.b. requires that yeast production and batch data be maintained.

Monitoring Summary: This data has been compiled for the batches listed below and is maintained at the facility.

Requirement: Item #3.c. requires that the VOC instruments be calibrated at least once per week.

Monitoring Summary: The instruments were properly calibrated during this period.

### **Section VI.A. Condition #1993 Fuel Oil Sulfur Content and Usage**

Requirement: Item #1 limits the sulfur in fuel oil #2 fired in the boilers.

Monitoring Summary: Red Star has not received any #2 fuel oil nor combusted any #2 fuel oil since the MFR permit was issued.

Requirement: Item #2 stipulates that fuel oil #2 may only be burned in the boilers under certain circumstances.

Monitoring Summary: Red Star has not received any #2 fuel oil nor combusted any #2 fuel oil since the MFR permit was issued.

Requirement: Item #3 requires that the sulfur content of each load of #2 fuel oil be determined either through vendor certification or Red Star lab analysis.

Monitoring Summary: Red Star has not received any #2 fuel oil nor combusted any #2 fuel oil since the MFR permit was issued.

Requirement: Item #4 requires that the amount of #2 fuel oil usage be recorded.

Monitoring Summary: Red Star has not received any #2 fuel oil nor combusted any #2 fuel oil since the MFR permit was issued.

**CONFIDENTIAL BUSINESS INFORMATION**

**Fermentation Batches Monitored 1/1/01 – 6/30/01**

Source	Fermenter No.	Stock	1 <sup>st</sup> Generation	Trade	Total
S-3	1				
S-4	2				
S-5	3				
S-6	4				
S-7	5				
Total					

Confidential Business  
Information Redacted

**CONTACT**

Alan Bahl, Regional EHS Engineer  
(410) 298-5004

**CERTIFICATION**

Under penalty of perjury, I certify that based on information and belief formed after reasonable inquiry, the answers, statements and information contained in this semi-annual monitoring report are true, accurate, and complete. I also certify that I am the responsible official as defined in District Regulation 2, Rule 6.

*William Tesch*

William Tesch  
Vice President, Operations  
Lesaffre Yeast Corporation

*7-25-01*

Date Signed

Director of the Air Division (Certified Mail No. 7099 3400 0012 2007 4123, Return Receipt Requested)  
USEPA, Region IX  
75 Hawthorne Street  
San Francisco, CA 94105  
Attention: Air-3

**FEDERAL EXPRESS**

February 25, 2001

Bay Area Air Quality Management District  
939 Ellis Street  
San Francisco, CA 94109  
ATTN: Mr. Victor Morales-Laimon

**SENSIENT**

Sensient Technologies Corporation  
777 East Wisconsin Avenue  
Milwaukee, WI 53202-5304  
Tel 414 271-6755  
sensient-tech.com

RE: Change of Operational Responsibility – Administrative Permit Amendment  
Major Facility Review Permit No. A3523  
Red Star Yeast and Products  
1384 Fifth Street  
Oakland, CA 94607

Dear Mr. Morales-Laimon:

Prior correspondence from the undersigned notified your agency that, effective February 20, 2001, the ownership of the above-noted facility would change from Universal Foods Corporation (doing business as Sensient Technologies Corporation) to SAF (USA) Corporation. Your agency was subsequently notified by facsimile correspondence that, due to altered circumstances, the transfer of ownership did not occur on February 20, 2001, and that you would be contacted when a revised date of transfer was determined.

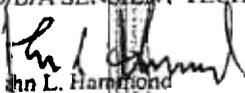
The purpose of this letter is to advise you that effective February 23, 2001, ownership of the above-noted facility changed from Universal Foods Corporation to SAF (USA) Corporation. The change in operational responsibility qualifies as an Administrative Permit Amendment under District Regulation 2, Rule 6, Section 201 enclosed herein as required by Regulation 2 permit accordingly.

The new contact person for this facility is:

Mr. Mike Cunningham, Plant Manager  
Red Star Yeast  
P.O. Box 23712  
Oakland, CA 94623  
Phone (510) 272-9033, x311  
Fax (510) 839-3069

For questions concerning Universal Foods' past operation of the facility, please do not hesitate to contact Alan Bahl at (410) 298-5004; for those concerning SAF (USA) operations, please contact Mike Cunningham at 510-272-9033.

Sincerely,  
UNIVERSAL FOODS CORPORATION  
D/B/A SENSIENT TECHNOLOGIES CORPORATION



John L. Hammond  
Vice President, Secretary & General Counsel

cc: Mr. Orick H. Robinson

Enclosure

PERMIT TRANSFER AGREEMENT BETWEEN UNIVERSAL FOODS CORPORATION D/B/A SENSIENT TECHNOLOGIES CORPORATION AND SAF (USA) CORPORATION

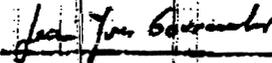
Universal Foods Corporation d/b/a Sensient Technologies Corporation, a Wisconsin corporation ("Universal Foods"), and SAF (USA) Corporation, a Delaware corporation ("SAF") hereby agree that coverage and responsibility for the permit(s) referenced in the attached cover letter will transfer from Universal Foods to SAF upon the closing of the Asset Purchase Agreement by and between Universal Foods and SAF, which is expected to occur on February 20, 2001 (the date of such closing, the "Closing Date"). SAF hereby agrees that it will assume all liability and responsibility for compliance with all terms and conditions of the permit(s) on the Closing Date. Universal Foods has provided SAF with information that SAF is willing to assume all responsibilities and obligations under such permits.

IN WITNESS WHEREOF, the parties hereto have executed this Agreement as of

Feb. 16, 2001  
UNIVERSAL FOODS CORPORATION  
d/b/a SENSIENT TECHNOLOGIES  
CORPORATION

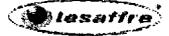
SAF (USA) CORPORATION

By   
Name: John L. Hammond  
Title: Vice President, Secretary  
& General Counsel

By   
Name: John-Todd Guarnow  
Title: Vice-President of Operations  
SAF (USA) CORPORATION

# LESAFFRE YEAST CORPORATION

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January 22, 2002

Director of Compliance and Enforcement  
Bay Area Air Quality Management District  
939 Ellis Street  
San Francisco, CA 94109  
Attention : Title V Reports

RE : Major Facility Review Permit - Facility # B2975  
Semi-annual Monitoring Report (7/01/01 – 12/31/01)  
Lesaffre Yeast Corporation – (Red Star Products)  
1384 Fifth Street  
Oakland, CA 94607

Dear Compliance Specialist :

As required by Section I.F. of the referenced permit, The charts on the following pages represent the Semi-Annual Monitoring Report for Lesaffre Yeast Corporation – Facility # B2975. Lesaffre Yeast Corporation did not experience any instances of non-compliance with any permit condition or applicable limit during the referenced period of (7/1/01 – 12/31/01)

If you have any question or need any further information please do not hesitate to call Karl Curda at (414) 615-4034.



## Permit Conditions

Section VI.A. Condition # 12754 Yeast Fermenter Exhaust :	Requirement	Monitoring Summary (7/1/01 through 12/31/01)
	<u>Item # 1</u> limits the total carbon concentration in the exhaust gas from the sources S-3, S-4, S-5, S-6 and S-7	Each fermentation batch was in compliance with the emission limitations of this permit
	<u>Item # 2</u> requires that steps be taken to reduce or contain odors that cause an off-property nuisance.	There we no instances of non-compliance with this section
	<u>Item # 3</u> requires that the exhaust gas total carbon concentration shall be recorded, using a District approved monitor, at least once per hour during each fermentation batch. This information shall then be used to calculate the average carbon concentration for the batch. This applies to sources S-3, S-4, S-5, S-6, and S-7.	The required monitoring was conducted for each yeast fermentation batch. The list of batches is attached, however, this listing is considered Confidential Business Information and we request that the district treat it as such.
	<u>Item # 3 b.</u> requires that the yeast production and batch data are maintained.	The data is compiled for the batches listed in the attachment and is maintained at the facility.
	<u>Item # 3 c.</u> requires that the VOC instruments be calibrated at least once per week.	The instruments were properly calibrated during this period.

**Permit Conditions - continued**

<b>Section VI.A. Condition # 1993 Fuel Oil Sulfur Content and Usage</b>	<b>Requirement</b>	<b>Monitoring Summary (7/1/01 through 12/31/01)</b>
	<i>Item # 1</i> limits the sulfur in fuel oil #2 fired in the boilers	Lesaffre Yeast Corp. has not received any # 2 fuel oil, possess storage for any #2 fuel oil, or combusted any during the period
	<i>Item # 2</i> stipulates that fuel oil #2 may only be burned in the boilers under certain circumstances.	Lesaffre Yeast Corp. has not received any # 2 fuel oil, possess storage for any #2 fuel oil, or combusted any during the period
	<i>Item # 3</i> requires that the sulfur content of each load of # 2 fuel oil be determined either through vendor certification or Lesaffre Lab analysis.	Lesaffre Yeast Corp. has not received any # 2 fuel oil, possess storage for any #2 fuel oil, or combusted any during the period
	<i>Item # 4</i> requires that the amount of # 2 fuel oil usage be recorded.	Lesaffre Yeast Corp. has not received any # 2 fuel oil, possess storage for any #2 fuel oil, or combusted any during the period

Please note : all material on this page is **CONFIDENTIAL BUSINESS INFORMATION**

**Fermentation Batches Monitored**

Ferm. No.	Stack #	Stock		1st Generation		Trade		Total	
		Jan 1-Jun 30	Jul 1-Dec31	Jan 1-Jun 30	Jul 1-Dec31	Jan 1-Jun 30	Jul 1-Dec31	Jan 1-Jun 30	Jul 1-Dec31
1	S-3								
2	S-4								
3	S-5								
4	S-6								
5	S-7								
Total Sum									

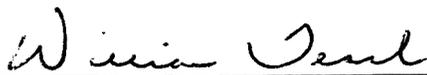
**Confidential Business  
Information Redacted**

## Contact : for this report

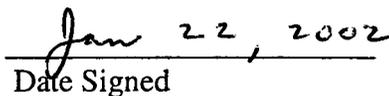
Karl Curda  
E H & S Manager  
(414) 615-4934

## Certification

Under penalty of perjury, I certify that based on information and belief formed after reasonable inquiry, the answers, statements and information contained in this semi-annual monitoring report are true, accurate and complete. I also certify that I am the responsible official as defined in District Regulation 2, Rule 6.



\_\_\_\_\_  
William Tesch  
V.P. Operations – Lesaffre Yeast Corp



\_\_\_\_\_  
Date Signed



FROM: J. GUTHRIE  
DATE: 6/29/99

**FedEx**  
**Next Day Delivery**

June 21, 1999

Director of Compliance and Enforcement  
Bay Area Air Quality Management District  
939 Ellis Street  
San Francisco, CA 94109  
ATTN: Title V Reports

U.S.S

RE Major Facility Review Permit. Facility #3523  
Semi-annual Monitoring Report, 12/16/98 - 6/15/98  
Red Star Yeast & Products/Universal Foods Corporation  
1384 Fifth Street  
Oakland, CA 94607

Dear Sirs:

As required by Section I.F. of the referenced permit, following is the Semi-Annual Monitoring Report for the referenced facility.

**PERMIT CONDITIONS**

**Section VI.A. Condition #12754 Yeast Fermenter Exhaust**

Requirement: Item #1 limits the total carbon concentration in the exhaust gas from sources S-3, S-4, S-5, S-6, and S-7.

Monitoring Summary: Except for the one batch in source S-3 noted below under **INSTANCES OF NON-COMPLIANCE**, each fermentation batch was in compliance with the emission limitations of this permit condition.

Requirement: Item #2 requires that steps be taken to reduce or contain odors which cause an off-property nuisance.

Monitoring Summary There were no instances of non-compliance with this condition.

**RED STAR® YEAST & PRODUCTS**

A DIVISION OF UNIVERSAL FOODS CORPORATION  
2100 VAN DEMAN STREET, HOLABIRD INDUSTRIAL PARK, BALTIMORE, MD 21224-6608  
(410) 633-8575 FAX (410) 633-6481

Requirement: Item #3.a. requires that the exhaust gas total carbon concentration shall be recorded, using a District approved monitor, at least once per hour during each fermentation batch. This information shall then be used to calculate the average carbon concentration for the batch. This applies to sources S-3, S-4, S-5, S-6, and S-7.

Monitoring Summary: The required monitoring was conducted for each yeast fermentation batch. The list of batches is enclosed herein, but is considered Confidential Business Information by Red Star who requests that the District treat it as such.

Requirement: Item #3.b. requires that yeast production and batch data be maintained.

Monitoring Summary: This data has been compiled for the batches listed below and is maintained at the facility.

Requirement: Item #3.c. requires that the VOC instruments be calibrated at least once per week.

Monitoring Summary: The instruments were properly calibrated during this period.

#### **Section VI.A. Condition #1993 Fuel Oil Sulfur Content and Usage**

Requirement: Item #1 limits the sulfur in fuel oil #2 fired in the boilers.

Monitoring Summary: Red Star has not received any #2 fuel oil nor combusted any #2 fuel oil since the MFR permit was issued.

Requirement: Item #2 stipulates that fuel oil #2 may only be burned in the boilers under certain circumstances.

Monitoring Summary: Red Star has not received any #2 fuel oil nor combusted any #2 fuel oil since the MFR permit was issued.

Requirement: Item #3 requires that the sulfur content of each load of #2 fuel oil be determined either through vendor certification or Red Star lab analysis.

Monitoring Summary: Red Star has not received any #2 fuel oil nor combusted any #2 fuel oil since the MFR permit was issued.

Requirement: Item #4 requires that the amount of #2 fuel oil usage be recorded.

Monitoring Summary: Red Star has not received any #2 fuel oil nor combusted any #2 fuel oil since the MFR permit was issued.

#### INSTANCES OF NON-COMPLIANCE WITH MONITORING REQUIREMENTS

DATE	SOURCE NO.	Permit Condition Non-compliance	Description of Non-compliance	BAAQMD Phone Notification	BAAQMD Letter Notification
4/7/99	S-3	Section VI.A.1.	Batch average VOC concentration 1,515 ppmv carbon vs. 300 ppmv carbon limit	4/7/99	4/13/99

Please note that, except as listed here, there were no instances of non-compliance with any permit condition or limit during the referenced period.

***CONFIDENTIAL BUSINESS INFORMATION***

**Fermentation Batches Monitored 12/16/98 – 6/15/99**

Source	Fermenter No.	Stock	1 <sup>st</sup> Generation	Trade	Total
S-3	1				
S-4	2				
S-5	3				
S-6	4				
S-7	5				
Total					

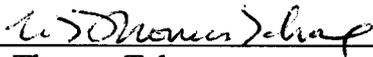
Confidential Business  
Information Redacted

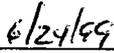
## CONTACT

Alan Bahl, Regional EHS Engineer  
(410) 631-5876

## CERTIFICATION

Under penalty of perjury, I certify that based on information and belief formed after reasonable inquiry, the answers, statements and information contained in this semi-annual monitoring report are true, accurate, and complete. I also certify that I am the responsible official as defined in District Regulation 2, Rule 6.

  
\_\_\_\_\_  
K.T. Thomas Tchang  
President, Red Star Yeast & Products

  
\_\_\_\_\_  
Date Signed



Tony

**FedEx**  
**Next Day Delivery**

December 22, 1998

Director of Compliance and Enforcement  
Bay Area Air Quality Management District  
939 Ellis Street  
San Francisco, CA 94109  
ATTN: Title V Reports

RE: Major Facility Review Permit. Facility #3523  
Semi-annual Monitoring Report, 7/1/98 – 12/15/98  
Red Star Yeast & Products/Universal Foods Corporation  
1384 Fifth Street  
Oakland, CA 94607

Dear Sirs:

As required by Section I.F. of the referenced permit, following is the Semi-Annual Monitoring Report for the referenced facility.

### **PERMIT CONDITIONS**

#### **Section VI.A. Condition #12754 Yeast Fermenter Exhaust**

Requirement: Item #1 limits the total carbon concentration in the exhaust gas from sources S-3, S-4, S-5, S-6, and S-7.

Monitoring Summary: There were no instances of non-compliance with the emission limits.

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## **RED STAR® YEAST & PRODUCTS**

**A DIVISION OF UNIVERSAL FOODS CORPORATION**  
2100 VAN DEMAN STREET, HOLABIRD INDUSTRIAL PARK, BALTIMORE, MD 21224-6608  
(410) 633-8575 FAX (410) 633-6481

Requirement: Item #2 requires that steps be taken to reduce or contain odors which cause an off-property nuisance.

Monitoring Summary: There were no instances of non-compliance with this condition.

Requirement: Item #3.a. requires that the exhaust gas total carbon concentration shall be recorded, using a District approved monitor, at least once per hour during each fermentation batch. This information shall then be used to calculate the average carbon concentration for the batch. This applies to sources S-3, S-4, S-5, S-6, and S-7.

Monitoring Summary: Except as noted below under **INSTANCES OF NON-COMPLIANCE**, the required monitoring was conducted for each yeast fermentation batch. The list of batches is enclosed herein, but is considered Confidential Business Information by Red Star who requests that the District treat it as such.

Requirement: Item #3.b. requires that yeast production and batch data be maintained.

Monitoring Summary: This data has been compiled for the batches listed below and is maintained at the facility.

Requirement: Item #3.c. requires that the VOC instruments be calibrated at least once per week.

Monitoring Summary: The instruments were properly calibrated during this period.

#### **Section VI.A. Condition #1993 Fuel Oil Sulfur Content and Usage**

Requirement: Item #1 limits the sulfur in fuel oil #2 fired in the boilers.

Monitoring Summary: Red Star has not received any #2 fuel oil nor combusted any #2 fuel oil since the MFR permit was issued.

Requirement: Item #2 stipulates that fuel oil #2 may only be burned in the boilers under certain circumstances.

Monitoring Summary: Red Star has not received any #2 fuel oil nor combusted any #2 fuel oil since the MFR permit was issued.

Requirement: Item #3 requires that the sulfur content of each load of #2 fuel oil be determined either through vendor certification or Red Star lab analysis.

Monitoring Summary: Red Star has not received any #2 fuel oil nor combusted any #2 fuel oil since the MFR permit was issued.

Requirement: Item #4 requires that the amount of #2 fuel oil usage be recorded.

Monitoring Summary: Red Star has not received any #2 fuel oil nor combusted any #2 fuel oil since the MFR permit was issued.

#### INSTANCES OF NON-COMPLIANCE WITH MONITORING REQUIREMENTS

DATE	SOURCE NO.	Permit Condition Non-compliance	Description of Non-compliance	BAAQMD Phone Notification	BAAQMD I Notificati
11/2/98	S-3	Section VI.A.3.a.	Did not monitor for 2 hours during batch	11/12/98	11/13/9
11/2/98	S-5	Section VI.A.3.a.	Did not monitor for 2 hours during batch	11/12/98	11/13/9
11/2/98	S-6	Section VI.A.3.a.	Did not monitor for 3 hours during batch	11/12/98	11/13/9

Please note that except as listed here, there were no instances of non-compliance with any permit condition or limit.

***CONFIDENTIAL BUSINESS INFORMATION***

**Fermentation Batches Monitored 7/1/98 – 12/15/98**

<b>Source</b>	<b>Fermenter No.</b>	<b>Stock</b>	<b>1<sup>st</sup> Generation</b>	<b>Trade</b>	<b>Total</b>
S-3	1				
S-4	2				
S-5	3				
S-6	4				
S-7	5				
<b>Total</b>					

**Confidential Business  
Information Redacted**

## CONTACT

Alan Bahl, Regional EHS Engineer  
(410) 631-5876

## CERTIFICATION

Under penalty of perjury, I certify that based on information and belief formed after reasonable inquiry, the answers, statements and information contained in this semi-annual monitoring report are true, accurate, and complete. I also certify that I am the responsible official as defined in District Regulation 2, Rule 6.

K. T. Thomas Tchong / by W. J.  
K.T. Thomas Tchong  
President, Red Star Yeast & Products

12/23/98  
Date Signed



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**FACSIMILE TRANSMISSION**  
**(415)928-0338**

September 23, 1998

Mr. Tony Gambardela  
Bay Area Air Quality Management District  
939 Ellis Street  
San Francisco, CA 94109  
ATTN: Title V Reports

RE: Major Facility Review Permit. Facility #3523  
Semi-annual Monitoring Report 1/1/98 - 6/30/98  
Red Star Yeast & Products/Universal Foods Corporation  
1384 Fifth Street  
Oakland, CA 94607

Dear Mr. Gambardela:

Please find enclosed the Monitoring Report for the referenced facility for the period 1/1/98 through 6/30/98. As was discussed between you and Mr. Alan Bahl of Red Star on September 23, 1998, Red Star understood that the Annual Compliance Certification Report (which was submitted to the District in June 1998) simultaneously satisfied the requirements of the first Semi-annual Monitoring Report. The vague wording of Section L.F. of the MFR Permit did not stipulate that two separate reports are due by July 1. Since the District has clarified its interpretation, Red Star will submit both the first Semi-annual Monitoring Report and the Annual Compliance Certification by July 1 each year and the second Semi-Annual Monitoring Report by January 1 each year.

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**RED STAR® YEAST & PRODUCTS**  
A DIVISION OF UNIVERSAL FOODS CORPORATION

1384 - 5TH STREET, P.O. BOX 23712, OAKLAND, CA 94623

Semi-Annual Monitoring Report, Facility #3523  
 September 23, 1998  
 Page 2

**REQUIRED MONITORING**

**Section VI.A.3.a. Yeast Fermenter Exhaust Gas Total Carbon Concentration**

**Requirement:** This condition requires that the exhaust gas total carbon concentration shall be recorded, using a District approved monitor, at least once per hour during each fermentation batch. This information shall then be used to calculate the average carbon concentration for the batch. This applies to sources S-3, S-4, S-5, S-6, and S-7.

**Monitoring Summary:** The required monitoring was conducted for each yeast fermentation batch. The list of batches is enclosed herein, but is considered Confidential Business Information by Red Star who requests that the District treat it as such.

**Section VI.A. Condition #1993 Fuel Oil Sulfur Content and Usage**

**Requirement:** Item 3. requires that the sulfur content of each load of #2 fuel oil be determined either through vendor certification or Red Star lab analysis. Item 4. requires that the amount of #2 fuel oil usage be recorded.

**Monitoring Summary:** Red Star has not received any #2 fuel oil nor combusted any #2 fuel oil since the MFR permit was issued.

**INSTANCES OF NON-COMPLIANCE WITH EMISSION LIMITS**

Date	Source No.	Permit Condition Non-Compliance	Description of Non-Compliance	BAAQMD Phone Notification	BAAQMD Letter Notification	BAAQMD NOV?
6/3/98	S-5	Section VI.A.1.	Batch average VOC 432 ppmv carbon/limit 300	6/3/98	6/17/98	NA-Breakdown #5634
5/15/98	S-6	Section VI.A.1.	Batch average VOC 420 ppmv carbon/limit 300	5/15/98	5/26/98	#30420, 8/3/98

Semi-Annual Monitoring Report, Facility #3523  
September 23, 1998  
Page 3

**CONFIDENTIAL BUSINESS INFORMATION**

**Fermentation Batches Monitored 1/1/98 - 6/30/98**

Source	Ferm No.	Stock	1st Generation	Trade	Total
S-3	1				
S-4	2				
S-5	3				
S-6	4				
S-7	5				
Total					

Confidential Business  
Information Redacted

Semi-Annual Monitoring Report, Facility #3523  
September 23, 1998  
Page 4

**CONTACT**

Alan Bahl, Regional EHS Engineer  
(410)631-5876

**CERTIFICATION**

Under penalty of perjury, I certify that based on information and belief formed after reasonable inquiry, the answers, statements and information contained in this semi-annual monitoring report are true, accurate, and complete. I also certify that I am the responsible official as defined in District Regulation 2, Rule 6.

*K.T. Thomas Tohang*  
K.T. Thomas Tohang  
President, Red Star Yeast & Products

*9/22/98*  
Date Signed



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CERTIFIED MAIL  
Return Receipt Requested

May 26, 1998

Mr. Michael Bostick  
Bay Area Air Quality Management District  
939 Ellis Street  
San Francisco, CA 94109

RE: Title V Permit - Noncompliance Reporting  
Facility #A3523

Dear Mr. Bostick:

As reported to you by telephone on May 15, 1998 at 2pm, the Red Star yeast Oakland facility experienced an exceedance of the VOC limit of condition VI.A.1. of the permit on May 15, 1998. The fermentation batch was #5423 which was run in unit S-6 from May 14 through May 15, 1998. The batch average VOC emissions were measured to be 420 ppmv carbon versus a limit of 300 ppmv carbon.

This exceedance was caused by operator error. Red Star's fermentation operator inadvertently fed too much molasses (i.e. sugar source) to the fermentation during the first hour of the batch. The excess sugar caused the yeast to begin alcoholic fermentation during which excess VOCs were produced and emitted. In order to reduce the emissions as quickly as possible, Red Star immediately cut back on the molasses feed. Overall, Red Star reduced the molasses feed to the batch by almost 50% from the scheduled batch protocol. However, the excess sugar at the beginning of the batch allowed too much VOCs to be produced to allow the total batch emissions to be in compliance.

The error occurred because the operator opened the wrong valves to feed the fermenter. In order to prevent this from recurring, Red Star has taken the following steps:

- 1) Operator was disciplined.
- 2) Operator was counseled and trained on proper standard operating procedures with regard to starting a fermentation.

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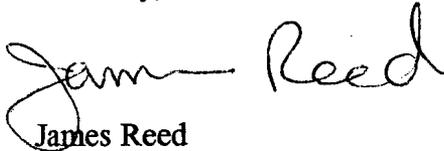
**RED STAR® YEAST & PRODUCTS**  
A DIVISION OF UNIVERSAL FOODS CORPORATION

1384 - 5TH STREET, P.O. BOX 23712, OAKLAND, CA 94623  
(510) 272-9045 FAX (510) 272-0809

Page Two

This report is being submitted to satisfy the requirements of condition I.F. of the permit. If you have any questions, please do not hesitate to contact Mr. Alan Bahl at (410) 631-5876 or me at (510) 272-9033.

Sincerely,

A handwritten signature in black ink that reads "James Reed". The signature is written in a cursive style with a large, looping initial "J" and a distinct "R".

James Reed  
Plant Manager



12/30/97

**CERTIFIED MAIL**  
**Return Receipt Requested**

December 18, 1997

Director of Compliance and Enforcement  
Bay Area Air Quality Management District  
939 Ellis Street  
San Francisco, CA 94109  
ATTN: Title V Reports

(P)

RE: Major Facility Review Permit. Facility #3523  
Red Star Yeast & Products/Universal Foods Corporation  
1384 Fifth Street  
Oakland, CA 94607

Dear Sirs:

As required by **Section I. F.** of the referenced permit, following is the Semi-Annual Monitoring Report for the referenced facility.

### **REQUIRED MONITORING**

#### **Section VI.A.3.a. Yeast Fermenter Exhaust Gas Total Carbon Concentration**

Requirement: This condition requires that the exhaust gas total carbon concentration shall be recorded, using a District approved monitor, at least once per hour during each fermentation batch. This information shall then be used to calculate the average carbon concentration for the batch. This applies to sources S-3, S-4, S-5, S-6, and S-7.

Monitoring Summary: Except as noted below under **INSTANCES OF NON-COMPLIANCE**, the required monitoring was conducted for each yeast fermentation batch. Due to the large number of batches which are monitored, Red Star has not submitted the monitoring information herein. The information is maintained at Red Star's facility as required by Section VI.A.3 of the permit.

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## **RED STAR® YEAST & PRODUCTS**

A DIVISION OF UNIVERSAL FOODS CORPORATION  
2100 VAN DEMAN STREET, HOLABIRD INDUSTRIAL PARK, BALTIMORE, MD 21224-6608  
(410) 633-8575 FAX (410) 633-6481

**Section VI.A. Condition #1993 Fuel Oil Sulfur Content and Usage**

Requirement: Item 3. requires that the sulfur content of each load of #2 fuel oil be determined either through vendor certification or Red Star lab analysis. Item 4. requires that the amount of #2 fuel oil usage be recorded.

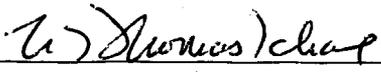
Monitoring Summary: Red Star has not combusted any #2 fuel oil since the MFR permit was issued.

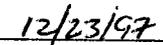
**INSTANCES OF NON-COMPLIANCE**

Date	Source No.	Permit Condition Non-Compliance	Description of Non-Compliance	BAAQMD Phone Notification	BAAQMD Letter Notification	BAAQMD NOV?
9/26/97	S-5	Section VI.A.3.a	Instrument down 2 hours.	10/8/97	10/10/97	--
10/1/97	S-5	Section VI.A.3.a	Instrument down 15 hours.	10/8/97	10/10/97	--
10/13/97	S-3	Section VI.A.1	Batch average VOC 473 ppmv carbon/limit 300	10/15/97	10/24/97	No. 30410, 11/19/97
10/18/97	S-1, S-2, S-3, S-4, S-5	Section VI.A.3.c.	VOC instruments not calibrated.	10/24/97	10/24/97	No. 30410, 11/19/97
11/13/97	S-3	Section VI.A.1	Batch average VOC 366 ppmv carbon/limit 300	11/19/97	12/18/97	--
11/18/97	S-4	Section VI.A.1	Batch average VOC 336 ppmv carbon/limit 300	11/19/97	12/18/97	--
12/11/97	S-3	Section VI.A.1	Batch average VOC 343 ppmv carbon/limit 300	12/18/97	12/18/97	--

### CERTIFICATION

Under penalty of perjury, I certify that based on information and belief formed after reasonable inquiry, the answers, statements and information contained in this semi-annual monitoring report are true, accurate, and complete. I also certify that I am the responsible official as defined in District Regulation 2, Rule 6.

  
\_\_\_\_\_  
K.T. Thomas Tchang  
President, Red Star Yeast & Products

  
\_\_\_\_\_  
Date Signed



**CERTIFIED MAIL NO. 7099 3220 0002 2640 3353**  
**Return Receipt Requested**

1/25/01

January 12, 2001

Director of Compliance and Enforcement  
Bay Area Air Quality Management District  
939 Ellis Street  
San Francisco, CA 94109  
ATTN: Title V Reports

RE: Major Facility Review Permit. Facility #3523  
Semi-annual Monitoring Report, 7/1/00 – 12/31/00  
Red Star Yeast & Products  
A division of Universal Foods Corporation d/b/a Sensient Technologies Corporation  
1384 Fifth Street  
Oakland, CA 94607

Dear Sirs

As required by Section I.F. of the referenced permit, following is the Semi-Annual Monitoring Report for the referenced facility.

**PERMIT CONDITIONS**

**Section VI.A. Condition #12754 Yeast Fermenter Exhaust**

Requirement: Item #1 limits the total carbon concentration in the exhaust gas from sources S-3 S-4, S-5, S-6, and S-7.

Monitoring Summary: There was one instance of non-compliance with the total carbon concentration limit during the period. The average total carbon concentration for batch #5691 that ended on 24 August 2000 in source S-5 was 669 ppmv. The concentration limit was 300 ppmv. This incident resulted from the failure of the aqua ammonia feed pump and flowmeter for the fermenter as detailed in the 19 August 2000 written report to the District. The incident was assigned Breakdown #02X40 by the District.

**RED STAR® YEAST & PRODUCTS**  
A DIVISION OF UNIVERSAL FOODS CORPORATION

1384 - 5TH STREET, P.O. BOX 23712, OAKLAND, CA 94623  
(510) 272-9045 FAX (510) 272-0800

Requirement: Item #2 requires that steps be taken to reduce or contain odors that cause an off-property nuisance.

Monitoring Summary: There were no instances of non-compliance with this condition.

Requirement: Item #3.a. requires that the exhaust gas total carbon concentration shall be recorded, using a District approved monitor, at least once per hour during each fermentation batch. This information shall then be used to calculate the average carbon concentration for the batch. This applies to sources S-3, S-4, S-5, S-6, and S-7.

Monitoring Summary: The required monitoring was conducted for each yeast fermentation batch. The list of batches is enclosed herein, but is considered Confidential Business Information by Red Star who requests that the District treat it as such.

Requirement: Item #3.b. requires that yeast production and batch data be maintained.

Monitoring Summary: This data has been compiled for the batches listed below and is maintained at the facility.

Requirement: Item #3.c. requires that the VOC instruments be calibrated at least once per week.

Monitoring Summary: The instruments were properly calibrated during this period

#### **Section VI.A. Condition #1993 Fuel Oil Sulfur Content and Usage**

Requirement: Item #1 limits the sulfur in fuel oil #2 fired in the boilers.

Monitoring Summary: Red Star has not received any #2 fuel oil nor combusted any #2 fuel oil since the MFR permit was issued.

Requirement: Item #2 stipulates that fuel oil #2 may only be burned in the boilers under certain circumstances.

Monitoring Summary: Red Star has not received any #2 fuel oil nor combusted any #2 fuel oil since the MFR permit was issued.

Requirement: Item #3 requires that the sulfur content of each load of #2 fuel oil be determined either through vendor certification or Red Star lab analysis.

Monitoring Summary: Red Star has not received any #2 fuel oil nor combusted any #2 fuel oil since the MFR permit was issued.

Requirement: Item #4 requires that the amount of #2 fuel oil usage be recorded.

Monitoring Summary: Red Star has not received any #2 fuel oil nor combusted any #2 fuel oil since the MFR permit was issued.

***CONFIDENTIAL BUSINESS INFORMATION***

**Fermentation Batches Monitored 7/1/00 – 12/31/00**

<b>Source</b>	<b>Fermenter No.</b>	<b>Stock</b>	<b>1<sup>st</sup> Generation</b>	<b>Trade</b>	<b>Total</b>
S-3	1				
S-4	2				
S-5	3				
S-6	4				
S-7	5				
Total					

Confidential Business  
Information Redacted

## CONTACT

Alan Bahl, Regional EHS Engineer  
(410) 631-5876 or (410) 298-5004

## CERTIFICATION

Under penalty of perjury, I certify that based on information and belief formed after reasonable inquiry, the answers, statements and information contained in this semi-annual monitoring report are true, accurate, and complete. I also certify that I am the responsible official as defined in District Regulation 2, Rule 6.

*William Tesch*

---

William Tesch  
Vice President, Operations  
Red Star Yeast & Products

*1-16-2001*

---

Date Signed



FedEx  
Next Day Delivery

July 24, 2000

Director of Compliance and Enforcement  
Bay Area Air Quality Management District  
939 Ellis Street  
San Francisco, CA 94109  
Attention: Title V Reports

Director of the Air Division  
US EPA, Region IX  
75 Hawthorne Street  
San Francisco, CA 94105  
Attention: Air-3

FROM: J. GUTHRIE
DATE: 7/26/00
<input checked="" type="checkbox"/> BEEAN
<input type="checkbox"/> J. CUTINO
<input type="checkbox"/> J. KARAS
<input type="checkbox"/> V. DVORAK
<input type="checkbox"/> J. GLASGOW
<input type="checkbox"/> 1. Forry
<input type="checkbox"/> 2. Imperia
<input type="checkbox"/> 3. Sittler (William)
<input type="checkbox"/> PLEASE DISCUSS RETURN

RE: Major Facility Review Permit.  
Facility #3523  
Semi-annual Monitoring Report, 1/1/00-6/30/00  
Red Star Yeast & Products  
A division of Universal Foods Corporation  
1384 Fifth Street  
Oakland, CA 94607

Dear Sir or Madam:

As required by Section I.F. of the referenced permit, following is the Semi-Annual Monitoring Report for the referenced facility.

### PERMIT CONDITIONS

#### Section VI.A. Condition #12754 Yeast Fermenter Exhaust

Requirement: Item #1 limits the total carbon concentration in the exhaust gas from sources S-3, S-4, S-5, S-6, and S-7.

Monitoring Summary: Each fermentation batch was in compliance with the emission limitations of this permit condition.

Requirement: Item #2 requires that steps be taken to reduce or contain odors that cause an off-property nuisance.

Monitoring Summary: There were no instances of non-compliance with this condition.

## RED STAR® YEAST & PRODUCTS

A DIVISION OF UNIVERSAL FOODS CORPORATION  
2100 VAN DEMAN STREET, HOLABIRD INDUSTRIAL PARK, BALTIMORE, MD 21224-6608  
(410) 633-8575 FAX (410) 633-6481

Requirement: Item #3.a. requires that the exhaust gas total carbon concentration shall be recorded, using a District approved monitor, at least once per hour during each fermentation batch. This information shall then be used to calculate the average carbon concentration for the batch. This applies to sources S-3, S-4, S-5, S-6, and S-7.

Monitoring Summary: There was one instance of non-compliance during the quarter. On April 24, 2000, the VOC monitoring system for S-4 was not in service from 3:40pm to 4:40pm. This was reported to the District as an Inoperative Parametric Monitor by fax on 4/25/00 and by letter dated 4/25/00.

Other than this one instance, the required monitoring was conducted for each yeast fermentation batch. The list of batches is enclosed herein, but is considered Confidential Business Information by Red Star who requests that the District treat it as such.

Requirement: Item #3.b. requires that yeast production and batch data be maintained.

Monitoring Summary: This data has been compiled for the batches listed below and is maintained at the facility.

Requirement: Item #3.c. requires that the VOC instruments be calibrated at least once per week.

Monitoring Summary: The instruments were properly calibrated during this period.

#### **Section VI.A. Condition #1993 Fuel Oil Sulfur Content and Usage**

Requirement: Item #1 limits the sulfur in fuel oil #2 fired in the boilers.

Monitoring Summary: Red Star has not received any #2 fuel oil nor combusted any #2 fuel oil since the MFR permit was issued.

Requirement: Item #2 stipulates that fuel oil #2 may only be burned in the boilers under certain circumstances.

Monitoring Summary: Red Star has not received any #2 fuel oil nor combusted any #2 fuel oil since the MFR permit was issued.

Requirement: Item #3 requires that the sulfur content of each load of #2 fuel oil be determined either through vendor certification or Red Star lab analysis.

Monitoring Summary: Red Star has not received any #2 fuel oil nor combusted any #2 fuel oil since the MFR permit was issued.

Requirement: Item #4 requires that the amount of #2 fuel oil usage be recorded.

Monitoring Summary: Red Star has not received any #2 fuel oil nor combusted any #2 fuel oil since the MFR permit was issued.

**INSTANCES OF NON-COMPLIANCE WITH MONITORING REQUIREMENTS**

<b>DATE</b>	<b>SOURCE NO.</b>	<b>Permit Condition Non-compliance</b>	<b>Description of Non-compliance</b>	<b>BAAQMD Fax Notification</b>	<b>BAAQMD Letter Notification</b>
4/24/00	S-4	Section VI.A.3.a.	VOC concentration not measured or recorded from 3:40pm – 4:40pm	4/25/00	4/25/00

Please note that, except as listed here, there were no instances of non-compliance with any permit condition or limit during the referenced period.

***CONFIDENTIAL BUSINESS INFORMATION***

**Fermentation Batches Monitored 1/1/00-6/30/00**

<b>Source</b>	<b>Fermenter No.</b>	<b>Stock</b>	<b>1<sup>st</sup> Generation</b>	<b>Trade</b>	<b>Total</b>
S-3	1				
S-4	2				
S-5	3				
S-6	4				
S-7	5				
<b>Total</b>					

**Confidential Business  
Information Redacted**

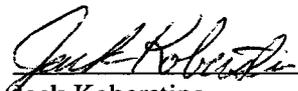
Semi-Annual Monitoring Report, Facility #3523  
July 24, 2000  
Page 5 of 5

**CONTACT**

Alan Bahl, Regional EHS Engineer  
(410) 298-5004

**CERTIFICATION**

Under penalty of perjury, I certify that based on information and belief formed after reasonable inquiry, the answers, statements and information contained in this semi-annual monitoring report are true, accurate, and complete. I also certify that I am the responsible official as defined in District Regulation 2, Rule 6.

  
\_\_\_\_\_  
Jack Koberstine  
President, Red Star Yeast & Products

7/25/00  
\_\_\_\_\_  
Date Signed



*Foods* O R

K. T. THOMAS TCHANG  
PRESIDENT  
RED STAR YEAST & PRODUCTS

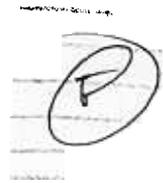
**FedEx**  
**Next Day Delivery**

December 23, 1999

*[Handwritten signature]*  
GLORIE  
12/29/99  
*[Handwritten signature]*

Director of Compliance and Enforcement  
Bay Area Air Quality Management District  
939 Ellis Street  
San Francisco, CA 94109  
ATTN: Title V Reports

RE: Major Facility Review Permit. Facility #3523  
Semi-annual Monitoring Report, 6/16/99 – 12/15/99  
Red Star Yeast & Products/Universal Foods Corporation  
1384 Fifth Street  
Oakland, CA 94607



Dear Sirs:

As required by Section I.F. of the referenced permit, following is the Semi-Annual Monitoring Report for the referenced facility.

**PERMIT CONDITIONS**

**Section VI.A. Condition #12754 Yeast Fermenter Exhaust**

Requirement: Item #1 limits the total carbon concentration in the exhaust gas from sources S-3, S-4, S-5, S-6, and S-7.

Monitoring Summary: There were no instances of non-compliance with the emission limits.

Requirement: Item #2 requires that steps be taken to reduce or contain odors that cause an off-property nuisance.

Monitoring Summary: There were no instances of non-compliance with this condition.

Requirement: Item #3.a. requires that the exhaust gas total carbon concentration shall be recorded, using a District approved monitor, at least once per hour during each fermentation batch. This information shall then be used to calculate the average carbon concentration for the batch. This applies to sources S-3, S-4, S-5, S-6, and S-7.

Monitoring Summary: The required monitoring was conducted for each yeast fermentation batch. The list of batches is enclosed herein, but is considered Confidential Business Information by Red Star who requests that the District treat it as such.

Requirement: Item #3.b. requires that yeast production and batch data be maintained.

Monitoring Summary: This data has been compiled for the batches listed below and is maintained at the facility.

Requirement: Item #3.c. requires that the VOC instruments be calibrated at least once per week.

Monitoring Summary: The instruments were properly calibrated during this period.

#### **Section VI.A. Condition #1993 Fuel Oil Sulfur Content and Usage**

Requirement: Item #1 limits the sulfur in fuel oil #2 fired in the boilers.

Monitoring Summary: Red Star has not received any #2 fuel oil nor combusted any #2 fuel oil since the MFR permit was issued.

Requirement: Item #2 stipulates that fuel oil #2 may only be burned in the boilers under certain circumstances.

Monitoring Summary: Red Star has not received any #2 fuel oil nor combusted any #2 fuel oil since the MFR permit was issued.

Requirement: Item #3 requires that the sulfur content of each load of #2 fuel oil be determined either through vendor certification or Red Star lab analysis.

Monitoring Summary: Red Star has not received any #2 fuel oil nor combusted any #2 fuel oil since the MFR permit was issued.

Requirement: Item #4 requires that the amount of #2 fuel oil usage be recorded.

Monitoring Summary: Red Star has not received any #2 fuel oil nor combusted any #2 fuel oil since the MFR permit was issued.

**CONFIDENTIAL BUSINESS INFORMATION**

**Fermentation Batches Monitored 6/16/99 – 12/15/99**

Source	Fermenter No.	Stock	1 <sup>st</sup> Generation	Trade	Total
S-3	1				
S-4	2				
S-5	3				
S-6	4				
S-7	5				
Total					

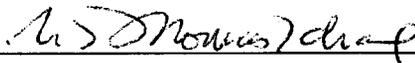
Confidential Business  
Information Redacted

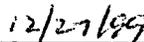
**CONTACT**

Alan Bahl, Regional EHS Engineer  
(410) 631-5876 or (410) 298-5004

**CERTIFICATION**

Under penalty of perjury, I certify that based on information and belief formed after reasonable inquiry, the answers, statements and information contained in this semi-annual monitoring report are true, accurate, and complete. I also certify that I am the responsible official as defined in District Regulation 2, Rule 6.

  
\_\_\_\_\_  
K.T. Thomas Tchang  
President, Red Star Yeast & Products

  
\_\_\_\_\_  
Date Signed