



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We Protect Hoosiers and Our Environment.*

*Mitchell E. Daniels, Jr.*  
**Governor**

*Thomas W. Easterly*  
**Commissioner**

100 North Senate Avenue  
Indianapolis, Indiana 46204  
(317) 232-8603  
Toll Free (800) 451-6027  
[www.idem.IN.gov](http://www.idem.IN.gov)

Kyle Thomas  
Chemical Engineer  
Cornerstone Environmental Health & Safety, Inc.  
880 Lennox Court  
Zionsville, IN 46077

April 23, 2008

RE: Response to Review Request  
No. 071-26391-00044  
Emission Factor Review/Integral Control Argument  
Cereplast, Inc.  
Plant ID: 071-00044

Dear Mr. Thomas:

On April 7, 2008, a review request for the evaluation of Mixing Emission Factor, Pneumatic Conveying Emission Factor, and a Pneumatic Conveying Dust Collector Integral Control Argument was received by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) from Cornerstone Environmental Health and Safety, Inc. (Cornerstone) on behalf of Cereplast, Inc. The summary of the request follows:

- (a) Cereplast, Inc. proposes to use the AP-42 emission factor from Chapter 8.2 Table 8.2-1 for urea bagging for its mixing process of powders and pellets.
- (b) Cereplast, Inc. proposes to use the AP-42 emission factor from Chapter 8.2 Table 8.2-1 for urea bagging for the numerous powders and pellets that are pneumatically conveyed to different locations within its facility.

IDEM, OAQ has examined whether the emission factor has been used for similar processes and has determined the emission factor has been previously accepted for a similar process used for Sabic Innovative Plastics US, LLC, Registration # 005-25552-00049, issued on December 11, 2007.

However, IDEM, OAQ did not specifically review and approve the use of this emission factor for Cereplast, Inc. processes. If Cereplast Inc. would like IDEM to approve the use of the urea bagging emission factor for the processes at their facility, they should submit a permit application with supporting documentation for review to the OAQ permitting branch.

- (c) Cereplast proposes that the control equipment on its conveying system is integral because the source cannot operate without the use of the equipment. Cereplast states that without the equipment excessive fine materials in the system will cause the equipment to plug and will not allow continued operation.

IDEM, OAQ has examined whether the integral control argument for a pneumatic conveying dust collector has been accepted for similar processes and has determined that the argument has been accepted for Sabic Innovative Plastics US, LLC, Registration #005-25552-00049, issued on December 11, 2007 and Berry Plastics Corporation, MSOP # 163-22999-00106, issued on November 9, 2007.

However, IDEM, OAQ evaluated sources on an individual case by case basis to determine if the control equipment was integral to the process. These determinations were based on supporting documentation within their permit applications. If Cereplast, Inc. requests approval to consider the control equipment integral to the process, they should submit a permit application with supporting documentation for review to the OAQ permitting branch.

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This letter does not qualify as an approval of the emission factor for mixing, the emission factor for pneumatic conveying, or the dust collector integral control argument for Cereplast, Inc.

If you have any questions on this matter, please contact Jason Krawczyk, 100 North Senate Avenue, MC61-53 IGCN 1003, Indianapolis, Indiana 46204-2251, at (317) 234-5175 or at (800) 451-6027 (ext 4-5175).

Sincerely/Original Signed By:

Iryn Calilung, Section Chief  
Permits Branch  
Office of Air Quality

CC: File - Jackson County  
U.S. EPA, Region V  
Air Compliance Section  
Compliance Data Section  
Administrative and Development

Mr. Charles Hoop  
Senior Vice President Operations Control  
Cereplast, Inc.  
3411 W. El Segundo Blvd.  
Hawthorne, CA 90250