



**Environmental
Protection Agency**

John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

September 12, 2011

**RE: BEMIS COMPANY, INC.
LARGE QUANTITY
GENERATOR
OHD 004 173 415
SUMMIT COUNTY
PRTC**

Mr. Mark Dembinski
Bemis Company, Inc.
1972 Akron Peninsula Road
Akron, Ohio 44313

Dear Mr. Dembinski:

I received your response to my July 22, 2011 Notice of Violation (NOV) letter on August 29, 2011. The documentation you submitted included: a photograph showing that adequate aisle space is now being maintained in the less than 90 day hazardous waste accumulation area; a revised tank inspection log which now includes spill control equipment; two weeks of completed, daily, tank inspection logs which now include the associated ancillary equipment.

My review of this documentation reveals that Bemis Company has adequately demonstrated abatement of the following violations discovered during the June 24 and July 19, 2011 inspection:

1. ***OAC Rule 3745-65-35, Preparedness and Prevention, Aisle Space.***
3. ***OAC Rule 3745-66-95(B)(1), Tank System Inspection Requirements.***
4. ***OAC Rule 3745-66-95(E), Tank System Inspection Requirements.***
7. ***OAC Rule 3745-66-93(F), Ancillary Equipment Requirements.***

Bemis Company has failed to submit a written assessment attesting that the design, installation and structural integrity of the tank system is adequate for the management of the hazardous waste being accumulated. In addition, no written statements by those persons who supervised installation or certified design of the new tank system, that the tank system was properly installed and designed, has been submitted as requested in Ohio EPA's July 25, 2011 NOV letter. Therefore, Bemis Company remains in violation of the following hazardous waste laws:

5. ***OAC Rule 3745-66-92(A), Tank System Requirements, Assessment:*** Your response letter of August 29, 2011 indicates the required assessment is being prepared and will be submitted to Ohio EPA by October 31, 2011. To return to compliance Bemis Company must submit this completed assessment.

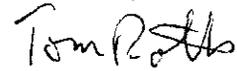
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6. **OAC Rule 3745-66-92(B), Tank System Requirements, Certification:** Your response letter of August 29, 2011 indicates the required certification is being prepared and will be submitted to Ohio EPA by October 31, 2011. To return to compliance Bemis Company must submit this completed assessment.

Please submit documentation demonstrating abatement of the above outstanding violations to this office **within 60 days** of your receipt of this letter.

Should you have any questions, please feel free to call me at (330) 963-1231.

Sincerely,



Tom Roth
District Representative
Division of Materials and Waste Management

TR/cl

ec: Jeff Mayhugh, DMWM, CO
Nyall McKenna, DMWM, NEDO
Natalie Oryshkewych, DMWM, NEDO

cc: Marlene Kinney, DMWM, NEDO