



AKRON REGIONAL AIR QUALITY MANAGEMENT DISTRICT

*Agent of the Ohio Environmental Protection Agency • Division of Summit County Public Health
Serving Medina, Portage and Summit Counties*

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Sam Rubens, MPA, R.S.
Administrator

June 11, 2013

CERTIFIED MAIL
HIGH PRIORITY FACILITY

Mr. Eugene Robinson
Bemis Company, Inc.
1972 Akron Peninsula Road
Akron, OH 44313

Re: NOTICE OF VIOLATION -
Facility ID: 1677000105
Bemis Company, Inc.
Location: 1972 AKRON PENINSULA RD.,
AKRON, OH 44313
Summit County

Dear Mr. Eugene Robinson:

On May 15, 2013 and May 16, 2013, I conducted a full compliance inspection of Bemis Company, Inc. ("Bemis"). The purpose of the inspection was to evaluate compliance with the terms and conditions of the applicable Title V permits, Permits to Install (PTIs) and state and federal rules and regulations. I would like to thank Mark Dembinski and Thomas Roland for their cooperation during my site visits.

Listed below are "Findings" based upon my observations and conversations with facility personnel, my review of the available records at the facility and my review of the submitted reports. The findings are followed by "Violation(s)" (if applicable) and "Requested Action(s)" necessary to address stated findings and violations.

1. Finding:

During the review of the records maintained at the facility, I observed that there were two weeks in December of 2012 that the record of the weekly inspection of the external integrity of the catalytic oxidizer was either missing or the weekly inspection was not completed.

Violation:

Failure to perform the required monitoring and to maintain the required recordkeeping is a violation of Title V Permit P0110040, Permit to Install (PTI) P0112091 for emissions unit P010, PTI P0109913 for emissions units K008, K010, K016 and K020 and PTI P0109912 for emissions unit K021 which state:



"...The permittee shall also perform weekly inspections of the external integrity of the catalytic oxidizer."

"The permittee shall maintain a record of the results of each annual and weekly inspection of the catalytic oxidizer..."

Requested Action:

Akron Regional Air Quality Management District (ARAQMD) requests that Bemis immediately comply with all the monitoring and recordkeeping requirements in accordance with the terms and conditions of the Title V Permit and the PTIs.

2. Finding:

During the review of the records received via e-mail, I observed that the individual hazardous air pollutant (HAP) and combined hazardous air pollutants (HAPs) emissions were not being calculated and recorded for each emissions unit separately as required by the terms and conditions of the permits.

Violation:

Failure to perform the required monitoring and to maintain the required recordkeeping is a violation of Title V Permits P0106317 and P0110040; PTIs P0108338 and P0109913 for emissions units K008, K010, K016 and K020; PTIs P0106672, P0108655 and P0109912 for emissions unit K021 and PTIs P0106570, P0111746 and P0112091 for emissions unit P010 which state:

"Each month the permittee shall calculate and record the following values for the previous month as well as the summation of the values for the previous 12-month period. Any credible method for performing these calculations is acceptable so long as the permittee retains records showing how they were completed.

- (1) *For each emissions unit, the calculated actual individual HAP emission rate for each HAP, in ton(s) per month*.*
- (2) *For the combustion of natural gas, the calculated actual individual HAP emission rate for each HAP, in ton(s) per month, using established US EPA emission factors.*
- (3) *The individual HAP emissions for each HAP for the last 12-month period for emissions units K003, K008, K010, K016, K020, K021, P010, T001, T002, and T003, combined, shall be summed with the individual HAP emissions for each HAP from the combustion of natural gas for the last 12-month period and compared to the emission limitation contained in 2.a) above.*

- (4) *For each emissions unit, the calculated actual combined HAP emission rate in tons per month*....”*

Requested Action:

ARAQMD requests that Bemis either immediately comply with all the monitoring and recordkeeping requirements in accordance with the terms and conditions of the Title V permits and the PTIs or within 30 days of the receipt of this letter submit applications to modify the monitoring and recordkeeping requirements in the current PTIs and Title V permit so that it matches how Bemis is doing the recordkeeping.

3. Finding:

During the review of the records maintained at the facility, I observed that the June 30, 2012 monthly inspection record of the capture system ductwork for emissions unit K003 indicated that the “BC exhaust needs repaired...” This deviation was not reported in the July 31, 2012 Title V quarterly deviation report.

Violation:

Failure to report a deviation is a violation of Emissions Unit Term and Condition C.3.e)(2)b. of Title V Permit P0106317 which states:

“The permittee shall submit quarterly (excursion) deviation reports that identify the following:

- a. *each time the interlock system does not stop the operation of the emissions units listed above when the catalytic oxidizer is not in operation and its use is necessary to be in compliance;*
- b. *each time any bypass dampers, actuator pins, and/or associated motors are not in the correct position and in good operating condition and/or any of the hooding or ductwork comprising the VOC emission capture system contains leaks or holes that would permit the escape of the captured VOC emissions;...”*

Requested Action:

ARAQMD requests that Bemis resubmit the Title V quarterly deviation report that was due on July 31, 2012 and included the above-mention deviation in the report within 30 days of the receipt of this letter.

4. Finding:

During the review of the records maintained at the facility, I observed that the blowers for emissions unit K010's gravure supply and exhaust were not recorded as being checked for the March 22, 2013 monthly inspection of the capture system.

Violation:

Failure to record the inspection of the blowers is a violation of Emissions Unit Term and Condition C4.d)(7) of Title V Permit P0110040 and C.2.d)(7) of PTI P0109913 which state:

“Each calendar month, during which the emissions units listed above are operated, the permittee shall inspect the operational condition and integrity of the following:

- a. *Each exhaust fan comprising the capture system. Exhaust fan observations shall include visual inspections of the fan wheel, belts, and bearings. Lubrication of bearings and replacement of parts shall occur as necessary.*
- b. *All hooding, ductwork, and bypass dampers comprising the capture system. Hooding and ductwork observations shall include visual inspections for leaks or holes. Bypass damper observations shall include visual inspections to verify that the damper setting is in the correct position (i.e., to the catalytic oxidizer or to atmosphere) and visual inspections of the actuator and motor to verify that the actuator pin and the motor are operating properly.*

The permittee shall document the results of all monthly inspections, including any corrective actions taken.”

Requested Action:

ARAQMD requests that Bemis takes measures to ensure that all future capture system inspections are properly documented.

5. Finding:

ARAQMD personnel spoke with facility personnel and learned that the permittee is not calculating the volatile organic compound (VOC) including the emissions generated from the natural gas combustion in the ovens on a monthly and rolling 12-month basis for emissions unit K021 and on a monthly and annual basis for emissions units K008, K010, K016 and K020.

Violation:

Failure to include the VOC emissions from the ovens in the monthly and annual calculations is considered a violation of Title V Permits P0106317 and P0110040 for emissions units K008, K010, K016, K020 and K021 and PTIs P0108338 and P0109913 for emissions units K008, K010, K016 and K020 and PTIs P0106672, P0108655 and P0109912 for emissions unit K021 which state either

“Each month the permittee shall calculate and record the VOC emissions for the previous month as well as the summation of the VOC emissions for the previous 12-month period (including emissions generated from the natural gas combustion in the ovens)) and compare the calculated emission rate to the emission limitation ...” or

“Each month the permittee shall calculate and record the VOC emissions for the previous month for each emissions unit listed above (including emissions generated from the natural gas combustion in the ovens) and at the beginning of each year compare the calculated emission rate to the emission limitation...”

Requested Action:

ARAQMD requests that Bemis either immediately comply with all the monitoring and recordkeeping requirements in accordance with the terms and conditions of the Title V permits and the PTIs or within 30 days of the receipt of this letter submit applications to modify the monitoring and recordkeeping requirements in the current PTIs and Title V permit so that it matches how Bemis is doing the recordkeeping.

6. Finding:

During the review of the records maintained at the facility, I observed that the records of the monthly inspections for the operational conditions and integrity of each ventilation fan, all hooding, ductwork and bypass dampers comprising the capture system were missing for December 2010 and August, September and December of 2012.

Violation:

Failure to perform and record the monthly inspections required above is considered a violation of Title V Permits P0106172, P0106317 and P0110040 and PTIs 16-02184 and P0109913 for emissions units K008, K010, K016 and K020 and PTIs 16-02495 and P0109912 for emissions unit K021.

Requested Action:

ARAQMD requests that Bemis takes measures to ensure that all future monthly inspections are performed and properly documented.

7. Finding:

During the review of the records maintained at the facility and reports submitted in Air Services, I observed that the permittee did not report that the data logger did not operate from approximately 11:00 p.m. on February 5, 2013 to 1:00 a.m. on February 6, 2013. In the quarterly report due April 30, 2013, it was reported that the data logger operated for 24 hours on both February 5 and 6, 2013.

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Requested Action:

ARAQMD requests that Bemis resubmit the Title V quarterly deviation report that was due on April 30, 2013 and correct the operating time of the data logger for February 5 and 6, 2013 within 30 days of the receipt of this letter.

8. Finding:

The monitoring, recordkeeping and reporting deviations in Findings 1, 2, 3, 4, 5, 6 and 7 were not reported in the semiannual deviation reports

Violation:

Failure to report deviations of the monitoring, recordkeeping and reporting is considered a violation of Title V Permits and PTIs.

Requested Action:

ARAQMD requests Bemis Company, Inc. resubmit the corresponding semiannual reports during which the monitoring, recordkeeping and reporting deviations occurred.

The violations listed above would constitute a violation of Ohio Revised Code (ORC) 3704.05(C) which states:

"No person who is the holder of a permit issued under division (F) or (G) of section 3704.03 of the Revised Code shall violate any of its terms or conditions."

Please submit to this office, within 30 days of receipt of this letter, a plan and schedule for achieving compliance. Submit this plan to the attention of Laura Miracle.

This letter or information pursuant to this letter does not constitute a waiver of the Ohio Environmental Protection Agency's (EPA) authority to seek civil penalties as provided in Section 3704.06 of the ORC. Ohio EPA will determine later whether to pursue such penalties in this case.

If you have any questions, please contact me by phone at (330)812-3953 or by e-mail at lmiracle@schd.org.

Sincerely,



Laura Miracle
Akron Regional Air Quality Management District

cc: Bruce Weinberg, Central Office, Ohio EPA
John Paulian, Central Office, Ohio EPA
Brian Dickens, Region 5 U.S. EPA