

# AKRON REGIONAL AIR QUALITY MANAGEMENT DISTRICT

*the Ohio Envir*

*Agency • Division of the Summit County*

*istrict*

*Storage and Summit Counties*

TELEPHONE: (330) 375-2480

FAX: (330) 375-2402

September 11, 2012

CERTIFIED MAIL  
High Priority Violator  
Criterion 8

Mr. Thomas DeColfmacker  
Bemis Company, Inc.  
1972 Akron Peninsula Road  
Akron, OH 44313

Re: NOTICE OF VIOLATION –

Facility ID: 1677000105  
Bemis Company, Inc.  
Location: 1972 Akron Peninsula Road,  
Akron, Ohio 44313  
Summit County

Dear Mr. Thomas DeColfmacker:

On June 28, 2012, Airtech Environmental Services Inc. performed a capture efficiency compliance test at the facility indicated above on the in-line flexo station of flexographic printing press WH5, emissions unit K020. Akron Regional Air Quality Management District received the test report on July 27, 2012. The test report has been reviewed. The results of the test showed in-line flexo station of K020 to be out of compliance with the applicable Ohio EPA regulations and your Title V permit terms and conditions.

OAC rule 3745-31-05(A)(3), the Permit to Install (PTI), and the Title V permit requires the central impression (CI) station and in-line flexo station of emissions unit K020 to be equipped with a capture system which is designed and operated to achieve a capture efficiency which is at least 78 percent, by weight, for volatile organic compounds (VOC). The test report indicated that the capture efficiency for the in-line flexo station of emissions unit K020 was 45%, by weight, for VOC. This constitutes a violation of OAC rule 3745-31-05(A), Emissions Unit Term and Condition C.2.b)(1)a. of PTI P0109913, and Emissions Unit Term and Condition C.4.b)(1)a. of Title V Permit P0106317.

OAC rule 3745-31-05(A)(3), the PTI and the Title V permit require the VOC emissions from the CI station and the in-line flexo station of emissions unit K020 to be vented to the catalytic oxidizer when the emissions unit is in operation. In a letter date May 11, 2012, you stated that on Wednesday, March 14, at approximately 4:30 a.m., a maintenance employee noticed that the press WH5, emissions unit K020, was in operation including the backside in-line flexo station, while the exhaust from this station was being vented to atmosphere. From the investigation of this incident, it was determined that there were potentially two additional dates that the in-line flexo station was vented to atmosphere. This constitutes a violation of OAC rule 3745-31-05(A)(3), Emissions Unit Term and Condition C.2.c)(2) of PTI P0108338, and Emissions Unit Term and Condition C.4.c)(2) of Title V Permit P0106317.

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OAC rule 3745-31-05(A)(3), the PTI and the Title V permit require the VOC emissions from the CI station and in-line flexo station to be vented to the catalytic oxidizer when emissions unit K016 is in operation. From May 28, 2012 through September 30, 2012, the in-line flexo station (adhesive station) was vented to atmosphere as discussed in a conference call on July 20, 2012 and reported in the revised July 31, 2012 quarterly Title V deviation report on August 7, 2012. This constitutes a violation of OAC rule 3745-31-05(A)(3), Emissions Unit Term and Condition C.1.c)(2) of PTI P0109913, and Emissions Unit Term and Condition C.3.c)(3) of Title V Permit P0106317.

Please submit to this office, within 30 days of receipt of this letter, a plan and schedule for achieving compliance for emissions unit K016. The letter you submitted on May 11, 2012 sufficiently addresses the steps taken to prevent future violations of the requirement to vent the VOC emissions from the CI station and the in-line flexo station of emissions unit K020 to the catalytic oxidizer when the emissions unit is in operation. Additionally, no plan and schedule for achieving compliance with the capture efficiency for emissions unit K020 is required since in-line flexo station was retested on the same day and shown to be in compliance with the capture efficiency after adjustments were made to this station. Submit this plan to the attention of Laura Miracle.

Acceptance by the Ohio EPA of a compliance plan and schedule does not constitute a waiver of the Ohio EPA's authority to seek civil penalties as provided in Section 3704.06 of the Revised Code. The determination to pursue or to decline to pursue such penalties in this case will be made by the Ohio EPA at a later date.

If you have any questions, please contact me at (330)812-3953 or E-mail [lmiracle@sched.org](mailto:lmiracle@sched.org).

Sincerely,



Laura Miracle  
Akron Regional Air Quality Management District

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