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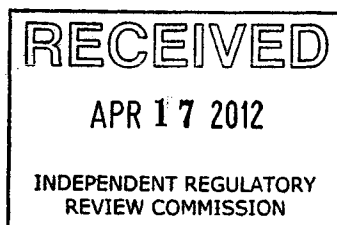
April 13, 2012

BEMIS COMPANY, INC.



VIA FEDERAL EXPRESS

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Attn: Ms. Susan Hoyle



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RE: Comments of Bemis Company, Inc. on the Air Pollution Control Act 25 Pa Code, Chapter 29 129.67 - Flexible Packaging Printing Presses, Offset Lithographic Printing Presses and Letterpress Printing Presses; Adhesives, Sealants, Primers and Solvents

SUBMITTED BY: Bemis Company, Inc.

Bemis Company, Inc. (Bemis) would like to submit the following comments with respect to the referenced Proposed Rule. Bemis owns and operates facilities in Pennsylvania which are subject to the provisions of 29 Pa Code 129.67.

Comments

Section 129.67a (c)(4) Emission limit options

This compliance option would appear to provide an equivalency approach where a site could meet the RACT rule by means of an averaging approach which would allow for use of non complying materials using control efficiencies below those specified under 129.67a (c)(3). If we properly understand this provision, we question whether it meets the intent of RACT as suggested in the CTG.

Section 129.67a (e) Recordkeeping and Reporting Requirements

Bemis believes the scope of the minimum recordkeeping requirements as set out under 129.67a (e)(1) should be narrowed to only apply to companies using a "compliant ink" approach to comply with this rule (under 129.67a (c)(1), (2) or possibly (4)).

Affected sites choosing to meet the requirements of this rule strictly through the use of an add on control device (under 129.67a (c)(3)) are subject to meeting a minimum overall control efficiency. The compliance demonstration under this compliance option is completely independent of the composition or quantity of the ink being used. Since the material specific records are not needed to demonstrate compliance with the provisions of the rule, there is no environmental or compliance benefit to maintaining them.

Bemis would suggest that the rule set out separate record keeping requirements specifically addressing appropriate records for the control device for sites meeting the rule through 129.67a (c)(3). Bemis would be willing to work with PADEP to develop pertinent record keeping requirements for this application, if that would be of help.

Bemis sincerely appreciates the opportunity to provide these comments.

Howard Hofmeister
Director of Environmental Affairs
Bemis Company, Inc.