

**Environmental
Protection Agency**

Ted Strickland, Governor
Ler Fischer, Lt. Governor
Chris Konecki, Director

September 9, 2010

RE: FORMER LAKE ERIE PRODUCTS
OHD004189817
CUYAHOGA COUNTY
CESSATION OF REGULATED OPERATIONS
NOTICE OF VIOLATION

David M. Wathen, President & CEO
TriMas Corporation
39400 Woodward Avenue, Suite 130
Bloomfield Hills, MI 48304

Dear Mr. Wathen:

On July 26, 2006, Trimas filed a one year temporary Cessation of Regulated Operations (CRO) notification with Ohio EPA for its former Lake Erie Products facility located at 13001 Athens Avenue, Lakewood, Ohio (see attached documents). Lake Erie Products never re-started operations at the location.

Lake Erie Products failed to file the *Regulated Substance and Equipment Removal EPA Form 0329*. As a result, Lake Erie Products is in violation of the following Ohio Administrative Code (OAC) rule:

**Responsibilities of owner/operator within 90-days of CRO
OAC 3745-352-20(2)(a), (b), and (g)**

1. *Submit to the director a copy of the most recent chemical inventory report required by section 3750.08 of the Ohio Revised Code.*
2. *Submit to the director a copy of the current hazardous chemicals list or each of the material safety data sheets required by section 3750.07 of the Ohio revised Code;*
3. *Certify to the director that you have complied with this rule using form EPA 0329*

To address this violation, please submit this form with all required information immediately. Form EPA 0329 ("90-Day Form") can be found at the following link: <http://epa.ohio.gov/portals/32/pdf/epa0329.pdf>

Failure to list specific deficiencies or violations in this communication does not relieve Lake Erie Products from the responsibility of complying with all applicable Ohio EPA laws and regulations. Please be advised that present or past instances of non-compliance can continue as subjects of pending or future enforcement actions.

Please feel free to contact me at (330) 963-1170 if you have any questions.

Sincerely,



Edward J. D'Amato
Environmental Specialist
Division of Hazardous Waste Management

EJD:ddw

cc: Ralph McGinnis, DHWM, CO
ec: Frank Popotnik, DHWM, NEDO