



Environmental
Protection Agency

Ted Strickland, Governor
Lee Fisher, Lt. Governor
Chris Korleski, Director

CERTIFIED MAIL

July 14, 2010

Mr. Terrence Profughi
Hi TecMetal Group, Inc.
1101 E. 55 St.
Cleveland, OH 44103

RE: HI TECMETAL GROUP, HYDRO-VAC, 1177 MARQUETTE ST, CLEVELAND, 44114, OHR00002873, CUYAHOGA, CRO COMPLETION & CLOSURE NOV

Dear Mr. Profughi:

On March 2, April 23 and July 6, 2009, Hi TecMetal Group (HTG) submitted documentation concerning compliance with Ohio's Cessation of Regulated Operations (CRO) laws as found under Chapter 3752 of the Ohio Revised Code (ORC) and Chapter 3745-352 of the Ohio Administrative Code (OAC). On April 28, 2009, I conducted an inspection of the HTG Hydro-Vac facility located at the above referenced address. Based upon submitted documentation and the inspection, HTG has satisfactorily completed the CRO regulatory process for its Hydro-Vac facility.

As you are aware, HTG entered into a Consent Order with the State of Ohio (State of Ohio v. Hi TecMetal Group, Inc., et. al., Case No. CV03509780) on November 14, 2003. Subsequently, on January 22, 2007, HTG entered into an amended Consent Order with the State of Ohio. The Consent Order, in part, required HTG to complete closure activities in accordance with OAC rules 3745-55-10 to 3745-55-20 for the Hydro-Vac facility.

On June 22, 2007, the Director of Ohio EPA approved the closure plan for the hazardous waste management units (HWMUs) located at the facility. In accordance with OAC rule 3745-55-13 and paragraphs 13 and 16 of the Consent Order, HTG was required to implement the approved closure plan in the manner and time frames set forth therein. As of this date, HTG has not completed on-site closure activities in accordance with the approved closure schedule. Therefore, HTG is in violation of OAC rule 3745-55-13 and paragraphs 13 and 16 of the Consent Order. HTG must abate this violation by completing closure activities in accordance with the approved closure plan schedule.

Within 30 days of receipt of this letter, submit a response addressing each of the above violations.

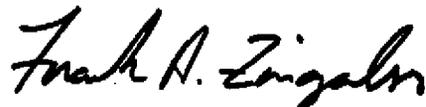
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Be advised that until the implementation of an approved closure plan and certification of closure for the HWMUs at the Hydro-Vac facility, HTG will remain in violation of Ohio Revised Code 3734.02 (E) and (F) and the rules adopted thereunder.

Failure to list specific deficiencies in this communication does not relieve HTG from the responsibility of complying with all applicable hazardous waste regulations. This letter does not relieve your facility from the liability for any past or present violations of the state's hazardous waste laws.

Should you have any questions, please contact me at (330) 963-1108.

Sincerely,



Frank A. Zingales
Environmental Specialist
Division of Hazardous Waste Management

FAZ:ddw

cc: Brian Ball, AGO
ec: Nyall McKenna, DHWM, NEDO
Frank Popotnik, DHWM, NEDO
Natalie Oryshkewych, DHWM, NEDO
Kelly Smith, DHWM, CO
Harry Sarvis, DHWM, CO