



State of Ohio Environmental Protection Agency

Northeast District Office

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CERTIFIED MAIL

December 17, 2008

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

**RE: HTG-WALKER HEAT TREATING, 10601 BRIGGS ROAD,
CLEVELAND, OH 44111, OHD004197307, CUYAHOGA**

Dear Mr. Profughi:

Hi TecMetal Group (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 Walker Heat Treating facility.

On March 29, 2007, the Director of Ohio EPA approved the amended closure plan for the hazardous waste management units (HWMUs) located at the facility. In accordance with OAC rule 3745-55-13 and paragraph 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 paragraph 13 and 16 of the Consent Order. HTG must abate this violation by completing closure activities in accordance with the approved closure plan schedule. HTG must implement corrective actions at the Walker Heat Treating facility for all areas in excess of the remedial standards identified in the March 29, 2007 approved closure plan, including those recently identified during the May 6, 2008 sampling event. Additionally, HTG must determine the full extent of contamination for the area identified during the May 6, 2008 sampling event.**

On April 25, 2008, Ohio EPA approved the Compliance Ground Water Monitoring Program Plan (CGWMPP) for the facility. As of this date, HTG has failed to implement the approved CGWMPP, including quarterly sampling of the monitoring wells at the facility. **Therefore, HTG is in violation of OAC rule 3745-54-91, OAC rule 3745-55-13 and paragraph 13 and 16 of the Consent Order. HTG must abate this violation by implementing the approved CGWMPP in accordance with the conditions and schedule set forth therein.**

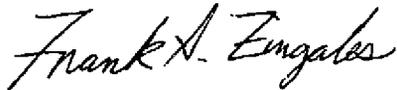
HTG-WALKER HEAT TREATING
DECEMBER 17, 2008
PAGE - 2 -

In correspondence submitted during October 2008, HTG indicated that fencing was installed to the property boundaries at the Walker Heat Treating facility. Additionally, HTG indicated that the concrete apron for monitoring well 17 (MW-17) was repaired.

Ohio EPA's failure to list specific deficiencies or violations in this letter does not relieve HTG from having to comply with all applicable regulations.

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
Kelly Smith, DHWM, CO
ec: Nyall McKenna, DHWM, NEDO