



State of Ohio Environmental Protection Agency

Northeast District Office

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Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director

CERTIFIED MAIL

October 5, 2009

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

**RE: HI TECMETAL GROUP, WALKER HEAT TREATING, 10601 BRIGGS ROAD,
CLEVELAND, OH 44111, OHD004197307, CUYAHOGA, CLOSURE NOV**

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 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.**

HTG has failed to implement the approved Compliance Ground Water Monitoring Program Plan (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.**

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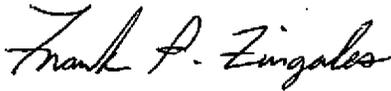
Within 30 days of receipt of this letter, submit a response addressing each of the above violations.

Be advised that until the implementation of an approved closure plan and certification of closure for the HWMUs at the Walker Heat Treating 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
Natalie Oryshkewych, DHWM, NEDO
ec: Nyal McKenna, DHWM, NEDO
Kelly Smith, DHWM, CO
Harry Sarvis, DHWM, CO