



Environmental
Protection Agency

John R. Kasich, Governor

Mary Taylor, Lt. Governor

Scott J. Nally, Director

July 13, 2012

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

**RE: HTG WALKER HEAT TREATING, 10601 BRIGGS ROAD, CLEVELAND, OH
OHD004197307, CUYAHOGA, GROUNDWATER MONITORING ACTIVITIES**

Dear Mr. Profughi:

On June 21, 2012, Rich Kurlich representing Ohio EPA, Division of Drinking and Ground Waters, and this writer, representing Ohio EPA, Division of Materials and Waste Management, conducted a site inspection of the monitoring wells at the Hi TecMetal Group (HTG), Walker Heat Treating facility, located at 10601 Briggs Road in Cleveland, Ohio. Consultants Marta Nelson and Rudy Zupan of Compliance Technologies, Inc. represented HTG during the inspection and performed purging and sampling activities. During this inspection, all of the monitoring wells (MWs) at the site were inspected and the purging and sampling of MW-3, MW-6 and MW-17 was observed. Ground water monitoring activities are being conducted in accordance with Ohio Administrative Code (OAC) rules 3745-54-90 through OAC 3745-54-100, the approved Compliance Ground Water Monitoring Program Plan (CGWMPP), an approved amended closure plan and a judicial consent order (CV03509780).

Based on the inspection, Ohio EPA identified the following violation:

1. **OAC rule 3745-9-03(B)** requires that a monitoring well that is damaged or deteriorated must be either repaired to a state consistent with construction requirements of paragraph (A) of this rule, or sealed in accordance with paragraph (A) of this rule. OAC rule 3745-9-03(A) specifies that the "Ohio EPA Technical Guidance Manual for Hydrogeologic Investigations and Ground Water Monitoring (TGM)" or other standards adopted by the director of Ohio EPA, shall be used as a guide for monitoring well construction and sealing to prevent the contamination of ground water.

The concrete apron for MW-13 is currently elevated above the ground surface and is supported entirely by the PVC inner well casing. If this problem is not addressed, damage may be done to the annular seal which may allow surface water and contaminants to enter the ground water.

To abate this violation, HTG must close the gap between the ground surface and the well apron. It is recommended that this be accomplished by increasing the size and thickness of the current apron with the installation of additional concrete or by replacing the current apron. Alternatively, HTG may choose to abandon this well using the Ohio EPA TGM as guidance. If HTG chooses to abandon this well, a brief work plan summarizing the abandonment procedures must be submitted to Ohio EPA for review and approval.

Ohio EPA has the following comments:

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2110 East Aurora Road
Twinsburg, OH 44087-1924

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2. In the future, static water levels must be measured in all of the monitoring wells during each sampling event. The additional water level measurements will be helpful in constructing more accurate ground water flow maps.
3. In accordance with the approved CGWMPP, all static water level measurements must be measured to the nearest hundredth of an inch. HTG must measure static water levels and total depths of the monitoring wells to the nearest hundredth of an inch.
4. During sampling activities, sample containers, caps and other equipment were placed directly on the ground. To reduce the possibility of cross contamination, it is recommended that a dedicated, disposable sheet of plastic be placed near each wellhead to create a clean surface for sample containers and equipment.
5. Although the CGWMPP does not specify that custody seals will be used, it does state that the samples will be secured so that no one may tamper with the sample. Securing samples usually involves the use of signed custody seals on the cooler containing the samples. While the samples from this site are transported by the laboratory, it is recommended that signed custody seals be used on all coolers during transport and also at any time the samples are no longer in the custody of the sampler.
6. The following monitoring well maintenance issues must be addressed:
 - A. MW-4 is poorly labeled with its identification information. To avoid confusion, this well should be re-labeled.
 - B. Although the concrete apron around MW-3 slopes away from the well, there is soil mounded around the well that is higher than the apron and could lead to water ponding on top of the well. It is recommended that additional grading be done in the vicinity of this well so that the soil is no longer mounded around this wellhead.
 - C. One of the tabs on the vault cover for MW-1 is broken. The tab must be repaired or a new vault lid must be installed.
 - D. New gaskets to help seal the well vaults and lids are needed on MW-1, MW-4, MW-7, MW-11, MW-13, MW-14 and MW-17. In addition, the area around many of the wells is covered with a fine grit. Cleaning the grit away from the wells and off the lip of the vault, vault lid and vault gasket area may help improve the seal and, thus prevent surface water from infiltrating into the well vault.

Within 30 days of receipt of this letter, please submit a response addressing each of the above violation and comments.

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: Steve Kovatch, CTI
ec: John Palmer, DERR, NEDO
Diane Kurlich, DDAGW, NEDO
Frank Popotnik, DMWM, NEDO