



State of Ohio Environmental Protection Agency

Northeast District Office

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CERTIFIED MAIL

August 9, 2007

Bill Powers
Vice President of Operations
Hi TecMetal Group
1101 East 55TH Street
Cleveland, OH 44103-1046

**RE: HI TECMETAL GROUP, THERMAL TREATMENT CENTER
28910 LAKELAND BLVD., WICKLIFFE, OHR000005942, NOV**

Dear Mr. Powers:

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 Ohio Administrative Code (OAC) rules 3745-55-10 to 3745-55-20 for the Thermal Treatment Center (TTC) facility located at 28910 Lakeland Boulevard in Wickliffe, Ohio.

On December 29, 2006, Ohio EPA received from HTG the document entitled "Revised Amendment to 2002 RCRA Closure Plan with Summary of Initial Assessment Phase." The document pertained to the hazardous waste management units (HWMUs) located at the TTC, Old Salt Pit Room (OSPR). Further, the original closure plan for these HWMUs was approved by Ohio EPA on April 1, 2002.

In accordance with paragraph 13 of the Consent Order, HTG was to submit an amended closure plan for the OSPR by December 31, 2006. The document submitted on December 29, 2006 did not fulfill this requirement as it did not contain the pertinent components of an amended closure plan. As noted in Ohio EPA's January 18, 2007 letter, the Agency was willing to allow HTG to proceed with the additional assessment activities proposed in the December 29, 2006 document so long as an amended closure plan would be submitted by April 18, 2007.

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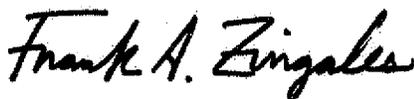
As of this date, HTG has not submitted an amended closure plan for the TTC-OSPR. Therefore, HTG is in violation of paragraph 13 of the Consent Order. Further, since the April 1, 2002 closure plan has not been amended, HTG remains in violation of OAC rule 3745-55-13 and paragraph 13 of the Consent Order as closure activities were not completed in accordance with the time frames set forth in the April 1, 2002 closure plan. **HTG must abate this violation by completing closure activities at the OSPR in accordance with OAC rules 3745-55-10 to 3745-55-20.**

Be advised that until the implementation of an approved closure plan and certification of closure for the HWMUs at the TTC-OSPR, 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
Jim Kavalec, DHWM, CO
Natalie Oryshkewych, DHWM, NEDO