



John R. Kasich, Governor  
Mary Taylor, Lt. Governor  
Scott J. Nally, Director

January 15, 2013

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

**RE: HTG WALKER HEAT TREATING, 10601 BRIGGS ROAD, CLEVELAND, OH  
OHD004197307, NOV-RTC, 2011 SUPPLEMENTARY ANNUAL REPORT**

Dear Mr. Profughi:

On March 1, 2012, Ohio EPA received from Hi TecMetal Group (HTG), the document entitled *2011 Supplementary Annual Ground Water Monitoring Report* for the Walker Heat Treating facility. 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 a review of HTG's *2011 Supplementary Annual Ground Water Monitoring Report*, Ohio EPA has identified the following violation and comments concerning this document:

#### **Violation**

1. OAC rule 3745-54-75 requires owners/operators to use the form and instructions supplied by the director, and omission of required information is considered a violation of this rule. The following required information was not included in the 2011 Supplementary Annual Ground Water Monitoring Report. Therefore, HTG is in violation of OAC rule 3745-54-75. In order to avoid a similar violation for the 2012 supplementary annual report, HTG must ensure that all required information is submitted by the March 1, 2013 deadline.
  - A. Section 2, item 6 (numbered 6.3 in HTG's *2011 Supplementary Annual Ground Water Monitoring Report*) requires that iso-concentration maps for contaminants detected in the ground water be submitted if the facility is in compliance monitoring or corrective actions. HTG states that it did not submit iso-concentration maps because only 6 of 17 wells were sampled in 2011. This is not an acceptable reason for not including iso-concentration maps in the annual report. HTG must ensure that the 2012 supplementary annual report includes iso-concentration maps for all contaminants detected in the ground water during each of the 2012 sampling events.

- B. Section 2, item 7 (numbered 6.7 in HTG's *2011 Supplementary Annual Ground Water Monitoring Report*), requires that the calculated or measured rates of contaminant migration of hazardous waste/constituents during the reporting period be included in the annual report. Instead of reporting rates of contaminant migration, HTG states that this requirement is not applicable because only 6 of 17 wells were sampled during 2011. This is not an acceptable reason for not including calculated or measured rates of contaminant migration. HTG must ensure that the 2012 supplementary annual report includes calculated or measured rates of contaminant migration.
- C. Section 9 of the annual reporting form is required to be completed for facilities in compliance monitoring. The Walker Heat Treating facility was in compliance monitoring. Therefore, the information required by Section 9 should have been addressed by HTG and included in the text of the 2011 annual report. HTG must ensure that all sections of the annual reporting form that apply to the Walker Heat Treating facility are completed when the 2012 supplementary annual report is submitted.

### Comments/Recommendations

2. Section 6, items 2 and 6 (numbered 2.1, 2.2, 6.1 and 6.2 in HTG's *2011 Supplementary Annual Ground Water Monitoring Report*), the figure (Figure 1) depicting monitoring well locations differs from the figure (Facility and Well Location Map) appearing in the approved CGWMPP. In particular, the locations of monitoring wells 4, 6 and 14 do not coincide. These figures must be reconciled and if necessary, the CGWMPP must be amended.

Prior to submittal of the 2012 supplementary annual report, the print quality of the map used to depict the locations of the hazardous waste management units, the ground water monitoring wells and the ground water flow direction (potentiometric map) should be improved so that all monitoring well identities are clearly legible.

3. As noted in the above comments, HTG has created its own numbering system in providing the information required under the supplementary annual ground water reporting form instructions. In the future, HTG should use the same numbering format that is provided in the supplementary annual ground water reporting form instructions provided by the director.

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

Sincerely,



Frank A. Zingales  
Environmental Specialist  
Division of Materials and Waste Management

FAZ:ddw

cc: Steve Kovatch, CTI  
ec: John Palmer, DERR, NEDO  
Diane Kurlich, DDAGW, NEDO  
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