



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

CERTIFIED MAIL

March 6, 2013

Thomas DeWeese
Bedford Anodizing Company
7860 Empire Parkway
Macedonia, OH 44056

Ronald Poole
Ronald G. Poole Trust
7010 Krick Rd.
Walton Hills, OH 44146

RE: *BEDFORD ANODIZING CO., 7010 KRICK RD., WALTON HILLS, OHD087715686, CUYAHOGA CNTY, CLOSURE & CONSENT ORDER NOV*

Dear Mr. DeWeese and Mr. Poole:

On February 20, 2013, this writer, representing Ohio EPA, Division of Materials and Waste Management (DMWM), visited the inactive Bedford Anodizing Company (BAC) facility, located at 7010 Krick Road in Walton Hills, Ohio to determine the status of closure and other Consent Order related activities. As you are aware, on April 27, 2011, BAC and the Ronald G. Poole Trust (Poole Trust) entered into a Consent Order with the State of Ohio (State of Ohio v. Bedford Anodizing Company, et. al., Case No. CV10718623). The Consent Order, in part, required BAC and the Poole Trust to complete closure activities in accordance with OAC rules 3745-55-10 through 3745-55-20 at the BAC-Walton Hills facility.

On November 16, 2011, the Director of Ohio EPA approved the closure plan for the hazardous waste management units (HWMUs) located at the BAC-Walton Hills facility. In accordance with OAC rule 3745-55-13 and paragraphs 8, 9 and 13 of the Consent Order, BAC and the Poole Trust were required to implement the approved closure plan in the manner and time frames set forth therein. In September 2012, Great Lakes Etching and Finishing Company, on behalf of the Poole Trust, funded closure activities consisting of hazardous waste removal at the Short Line area at the BAC-Walton Hills facility. However, BAC and the Poole Trust have not completed all closure activities in accordance with the approved closure plan and schedule. Therefore, BAC and the Poole Trust are in violation of OAC rule 3745-55-13 and paragraphs 8, 9 and 13 of the Consent Order. BAC and the Poole Trust must abate this violation by completing closure activities in accordance with the approved closure plan.

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In addition, please note the Consent Order also requires other activities that are specified in paragraphs 21, 22, 23 and 24. These activities must be completed within two years of the effective date (April 27, 2011) of the Consent Order and include:

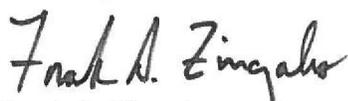
- Paragraph 21 – Remove and lawfully dispose of all other waste present in the Long and Short Line areas,
- Paragraph 22 – Clean out and lawfully dispose of all waste present in underground piping which leads to the settling pit/wastewater treatment unit (WWTU),
- Paragraph 23 – Remove and lawfully dispose of the F019 hazardous waste from the settling pit/WWTU, and
- Paragraph 24 – Remove and lawfully dispose of all waste present in containers at the BAC-Walton Hills facility.

You must immediately take the necessary measures to return to compliance with the Consent Order, closure plan and Ohio's environmental laws. Within 14 days of receipt of this letter, you are requested to provide documentation to this office including the steps taken to abate the violations cited above. Documentation of steps taken to return to compliance may be submitted via the postal service or electronically to frank.zingales@epa.ohio.gov.

Please be advised that the violations cited above will continue until the violations have been properly abated. Failure to comply with the Consent Order, ORC Chapter 3734 and the rules promulgated thereunder are subject to stipulated penalties as specified in the Consent Order. It is imperative that you return to compliance.

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

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