Re: HiTech Metal Thermal Treatment Ctr, Wickliffe Remediation Response

Subject: Amended Closure/Post-Closure Plan Approval, Hi TecMetal Group - Thermal Treatment Center, Old Salt Pit Room (OSPR), 28910 Lakeland Blvd., Wickliffe Ohio, OHR000005942 (Project/Site ID # 243-002945-002)

Dear Mr. Profughi:

On April 3, 2014, HI TecMetal Group Thermal Treatment Center (HTG-TTC) submitted to the Ohio Environmental Protection Agency (Ohio EPA) an amended closure/post-closure plan for the Old Salt Pit Room (OSPR), located at 28910 Lakeland Blvd., Wickliffe, Ohio. Revisions to the amended closure/post-closure plan were received on October 31, 2014. The amended closure/post-closure plan was submitted pursuant to the Consent Order filed on November 14, 2003 and subsequently modified on June 3, 2011 (State of Ohio v Hi TecMetal Group, Inc., et al., Case No. CV 03 509780 in the Court of Common Pleas, Cuyahoga County) to demonstrate that HTG-TTC's proposal for closure/post-closure complies with the substantive requirements of Ohio Administrative Code (OAC) rules 3745-55-11, 3745-55-12, and 3745-55-18.

HTG-TTC (owner/operator) and the public were given the opportunity to submit written comments regarding the amended closure/post-closure plan in accordance with the hazardous waste rule requirements. No public comments were received by Ohio EPA.

Ohio EPA approves the amended closure/post-closure plan (dated October, 2014) with the following modifications/conditions:

1) A detailed storm water assessment report shall be submitted to Ohio EPA within 60 days of the issuance of this letter. The report shall include actions completed and proposed to ensure no storm water or shallow ground water enters the waste unit.

2) Implementation of a storm water remedy as part of the closure activities shall be completed within 120 days of the issuance of this letter.
3) HTG-TTC shall implement remaining elements of the Amended CP after demonstrating that the storm water improvements are successful at keeping storm water from entering the waste unit (and within 180 days of the issuance of this letter).

4) Ohio EPA considers temporary removal of the ammonia tank to not be necessary. HTG could use available methods to significantly lower the permeability of the ground surface beneath the ammonia tank. Ohio EPA recommends HTG consider using subsurface injection of grout along the Electrical Room west wall (east of the ammonia tank) as an option to prevent storm water from entering the South Salt Pit (SSP). HTG-TTC shall make necessary storm water improvements but may exercise options which do not put an undue burden on the TTC business through the removal of an existing ammonia tank used in heat-treating operations.

5) HTG-TTC shall properly characterize and dispose any soil which is removed from the site and any ground water or surface water which enters the SSP. Hazardous waste manifests for any hazardous wastes shipped off site shall be supplied with the closure certification report summarizing closure activities to Ohio EPA.

6) All wash/rinse water shall be properly managed to minimize infiltration of the subsurface and mobilization of contaminants behind the permeable masonry walls and beneath the OSPR floor. Wash/rinse water entering the SSP shall be captured and containerized to the extent practicable so that no used wash water accumulates in the pit. Water should not be allowed to enter the North Salt Pit (NSP) due to waste remaining in the NSP.

HTG-TTC shall designate this wash/rinse water with hazardous waste codes F011 and F012 and properly dispose of this water. As a management option, the facility may wish to seek approval through the local sewer authority to discharge wash/rinse wastewater to the City of Euclid Publicly Owned Treatment Works (POTW).

7) HTG-TTC shall clean all of the estimated 2,400 square feet of contaminated walls prior to applying sealer to the walls (Amended CP page 26). Ohio EPA would prefer the sealed walls not have a drywall board wall placed in front of the masonry walls. However, should HTG decide to place drywall on the interior walls, access ports should be installed for HTG to periodically inspect the integrity of the wall sealer (see post-closure care below).

8) The Amended CP refers to the future development and implementation of a Risk Management Plan (RMP) “as discussed in the Post-Closure Construction” section (pages 18 and 33). HTG-TTC still needs to define the geographic area to which the RMP would apply. HTG-TTC shall issue the RMP to Ohio EPA within 120 days of the issuance of this letter as an addendum to the final OSPR Post-Closure plan.

Compliance with the approved closure/post-closure plan, including the conditions specified herein, is expected. Ohio EPA will monitor such compliance and reserves the
right to take action, pursuant to chapters 3734. and 6111. of the Ohio Revised Code, and other applicable law, to enforce such compliance and to seek appropriate remedies in the event of noncompliance with the provisions and modifications of this approved plan. Please be advised that approval of this amended closure/post-closure plan does not release HTG-TTC from any responsibilities regarding corrective action for all releases of hazardous waste or constituents from any waste management unit, regardless of the time at which waste was placed in the unit.

You are hereby notified that this action of the director is final and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within 30 days after notice of the director's action. The appeal must be accompanied by a filing fee of $70.00 (made payable to "Ohio Treasurer of State") which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the director within three days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
77 South High Street, 17th Floor
Columbus, OH 43215

When closure is completed, OAC rule 3745-55-15 requires the owner or operator of a facility to submit to the director of Ohio EPA, certification by the owner or operator and an independent, registered professional engineer, that the facility has been closed in accordance with the approved closure plan. The certification by the owner or operator shall include the statement found in OAC rule 3745-50-42(D). These certifications should be submitted to:

Ohio Environmental Protection Agency
Division of Environmental Response and Revitalization
P.O. Box 1049
Columbus, Ohio 43216-1049
Attn: Erik Hagen, ERAS
A copy should also be sent to:

Ohio Environmental Protection Agency  
Division of Environmental Response and Revitalization  
Northeast District Office  
2110 East Aurora Road  
Twinsburg, OH 44087-1924  
Attn: John Houck

If you have any questions about implementing this closure/post-closure plan, contact John Houck at (330) 963-1177 or john.houck@epa.ohio.gov. In future correspondence, please reference the USEPA ID Number OHR 000 005 942 and the Site ID Number 243-002945-002.

Sincerely,

Craig W. Butler  
Director  
Ohio Environmental Protection Agency

c: Harry Courtright, DERR, NEDO  
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