



**Environmental
Protection Agency**

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

Certified Mail: 7010 1060 0001 7896 3379

November 9, 2011

**GUERNSEY COUNTY
GENERAL FILE
(CAMBRIDGE HIGH SCHOOL)
DMWM/SEDO
OHR000165332**

Mr. Scott Eldredge, Principal
Cambridge High School
1401 Deerpath Drive
Cambridge, Ohio 43725-9097

Dear Mr. Eldredge:

On September 19, 2011, this office received a complaint alleging that spent parts washer solvent from the shop class was given to students who disposed of the solvent in an unknown location. On September 22, 2011, I performed a complaint investigation to determine if the allegations were valid.

Based on this investigation, we found the allegations to be true and a notice of violation was issued to you on September 30, 2011.

On October 31, I left a telephone message for you regarding this matter and requesting you to call me at your earliest convenience. I did not receive a return call so I visited you on November 3, 2011. You stated at that meeting that you were unable to determine the location where the students disposed of the waste and that the school was going to use a high-flashpoint, non-hazardous solvent in the future. However, I cited you in my September 30 letter for failure to have a proper waste evaluation for the spent parts washer solvent currently on-site. You stated that actions to address this issue had not been taken. I stated that this waste must be evaluated as soon as possible to resolve this violation and to avoid potential escalated enforcement. Therefore, Cambridge High School remains in violation of the following regulation:

(1) OAC rule 3745-52-11 Hazardous waste determination.

Any person who generates a waste, as defined in rule 3745-51-02 of the Administrative Code, must determine if that waste is a hazardous waste using the following method...determine if the waste is listed as a hazardous waste in rules 3745-51-30 to 3745-51-35, and then determine whether the waste is identified in rules 3745-51-20 to 3745-51-24 of the Administrative Code by

either: (1) Testing the waste according to the methods set forth in rules 3745-51-20 to 3745-51-24 of the Administrative Code, or according to an equivalent method approved by the Region V Administrator of U.S. EPA pursuant to 40 CFR 260.21; or (2) Applying knowledge of the hazardous characteristic of the waste in light of the materials or the processes used.

We observed a parts washer in the shop class and 5-gallon containers that Mr. Lappla indicated are used to collect spent washer fluid. He did not have documentation of waste evaluation for this waste. A sample of the dirty parts washer solvent should be collected to determine if this waste exhibits any hazardous waste characteristics (for flashpoint and TCLP metals and volatile organics); an environmental testing company can help you with this. This violation will be abated once I have received these results; in the meantime, provide documentation that an environmental testing company has collected a sample of this waste (i.e., a copy of the chain of custody form). I have attached a list of environmental laboratories for your convenience.

Cambridge High School needs to immediately take the necessary measures to return to compliance with 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 includes written correspondence, updated policies, and photographs, as appropriate, and may be submitted via the postal service or electronically to rich.stewart@epa.ohio.gov.

Please be advised that violations cited above will continue until the violations have been properly abated. Failure to comply with Chapter 3734. of the Ohio Revised Code and rules promulgated thereunder may result in a civil penalty of up to \$10,000 per day for each violation. It is imperative that you return to compliance. If circumstances delay the abatement of violations, Cambridge High School is requested to submit written correspondence of the steps that will be taken by a date certain to attain compliance.

Nothing in this letter shall be construed to authorize any waiver from the requirements of any applicable state or federal laws or regulations. This letter shall not be interpreted to release the owner or operator, or others, from responsibility under Chapters 3704, 3714, 3734, or 6111 of the Ohio Revised Code or under the Federal Clean Water Act, Resource Conservation and Recovery Act, or Comprehensive Environmental Response, Compensation, and Liability Act for remedying conditions resulting from any release of contaminants to the environment.

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If you have any questions, please contact me by telephone at (740) 380-5278 or by e-mail at rich.stewart@epa.ohio.gov.

Sincerely,

A handwritten signature in black ink, appearing to read 'R. Stewart', written over a horizontal line.

Richard Stewart
District Representative
Division of Materials and Waste Management

RS/mlm

cc: Dennis Dettra, Superintendent, Cambridge City Schools