



**Environmental
Protection Agency**

Ted Strickland, Governor
Lee Fisher, Lt. Governor
Chris Korleski, Director

Re: Kenton City Schools
Hardin County
Compliance Evaluation Inspection
Return to Compliance

October 27, 2010

Mr. W. Douglas Roberts, Superintendent
Kenton City Schools Board of Education
222 West Carrol Street
Kenton, Ohio 43326

Dear Mr. Roberts:

On December 8, 2009, I conducted a compliance evaluation inspection at several building locations of the Kenton City School System. The addresses of the building inspected are stated below. On January 7, 2010, I issued a notice of violation letter (NOV). I did not get any response. On March 18, 2010, I issued a second NOV. Again, I did not get any response. On August 23, 2010, I issued a third and final NOV. On October 4, 2010, I received a response letter. In the letter, you stated that you are planning to manage your spent bulbs as hazardous waste. You also included a copy of the spent bulb management agreement with Graybar, your electrical supplier.

Based on the information you submitted, all the violations discovered during the December 8, 2009, inspection have now been abated as listed below:

- A. **Kenton High School (OHD986977981)**
200 Harding Avenue
Kenton, Ohio 43326

Letter Citation #	Rule Citation	Date Discovered	RTI Date
1	OAC Rule 3745-52-11: Waste Evaluation	12/08/2009	10/04/2010

- B. **Kenton City Schools Maintenance Building (OHR000158527)**
300 Harding Avenue
Kenton, Ohio 43326

Letter Citation #	Rule Citation	Date Discovered	RTI Date
1	OAC Rule 3745-52-11: Waste Evaluation	12/08/2009	10/04/2010

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C. **Kenton City Schools Maintenance Garage (OHR000158535)**
1000 East Columbus
Kenton, Ohio 43326

Letter Number	Rule Cited	Date Discovered	File Date
1	OAC Rule 3745-52-11: Waste Evaluation	12/08/2009	10/04/2010
2	OAC Rule 3745-279-22 (C)(1): Used Oil – Labeling	12/08/2009	12/08/2009

Please note, if are managing your light bulbs as universal waste (recycling) and decide to accumulate the spent bulbs at any of your locations prior to sending them to be recycled, you must follow the universal waste rules container, record keeping, and labeling requirements. For you help on this matter, I am enclosing the following document: Universal Waste Rules for Handlers of Lamps, June 2005, and Computer, Fluorescent Lamp and Ballast Recyclers, November 2008.

Should you have any questions or if I can be of assistance, please contact me at (419)373-3015.

Sincerely,



Edgar V. Pulido
Division of Hazardous Waste Management

/lb

Enclosures

pc: Cindy Lohrbach, DHWM, NWDO
Colleen Weaver, DHWM, NWDO
~~DHWM, NWDO; File: Kenton City Schools, Hardin County~~

ec: Ed Pulido, DHWM, NWDO

NOTICE: Ohio EPA's failure to list specific deficiencies or violations in this letter does not relieve your company from having to comply with all applicable regulations.
