



State of Ohio Environmental Protection Agency

Southeast District Office

2195 Front Street
Logan, Ohio 43138

TELE: (740) 385-8501 FAX: (740) 385-6490
www.epa.state.oh.us

Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director

November 23, 2007

**MUSKINGUM COUNTY
GENERAL FILE
(FRANKLIN LOCAL SCHOOL DISTRICT -
PHILO HIGH SCHOOL)
DHWM/SEDO**

Mr. Robert Walden, Asst. Superintendent
Franklin Local School District
360 Cedar Street, P.O. Box 428
Duncan Falls, Ohio 43734-0428

Re: Notice of Violation – Philo High School

Dear Mr. Walden:

On November 8, 2007, Melody Stewart and I inspected Philo High School, located at 4000 Millers Lane in Duncan Falls, to determine compliance with Ohio's hazardous waste laws as found in Chapter 3734. of the Ohio Revised Code (ORC) and Chapter 3745. of the Ohio Administrative Code (OAC). This letter will explain any violations found as a result of the inspection and what you need to do to correct the violations, as well as any general concerns we have and how you can address those concerns.

We found the following violation of Ohio's hazardous waste laws. In order to correct this violation, you must do the following and send me the required information ***within 45 days*** of your receipt of this letter:

- (1) ***OAC Rule 3745-52-11, Hazardous Waste Determination.*** Any person who generates a waste must determine if that waste is a hazardous waste, in accordance with the criteria set forth in OAC Rule 3745-51.

During the inspection, it was determined that wastes generated by Philo High School's woodworking shop have not been evaluated to determine if they are hazardous wastes. Currently, paint brushes that were used to apply oil-based wood stain, varnish, sealer, etc. are cleaned with mineral spirits solvent in a small can. Brush cleaning waste (spent mineral spirits solvent contaminated with oil-based stains, thinners, and varnishes, and/or sealers) remaining in the can after the brushes are cleaned is disposed of in the trash. Shop rags used in clean up that are contaminated with solvent, stain, etc. are also disposed of in the trash, as are any furniture stripping wastes (spent stripper paint sludges, paint chips, and other residues). Woodshop students use mineral spirits solvent to wash their hands over

the grass outside the woodworking shop, and the excess solvent drips on the ground. All of the above practices are unacceptable. Philo High School must immediately cease these practices and begin collecting and containerizing wastes that are generated in the woodworking shop.

To abate this violation, Philo High School must evaluate the following wastes to determine if they are hazardous wastes:

- Brush cleaning waste - spent mineral spirits solvent contaminated with oil-based stains, thinners, and varnishes, and/or sealers. Once it has been determined if this waste is hazardous, the shop rags and paint brushes contaminated with this waste can be managed in the same manner.
- Furniture stripping waste (spent stripper paint sludges, paint chips, and other residues).

As we discussed during the inspection, Material Safety Data Sheet (MSDS) information can be used as a starting point in determining if a waste is hazardous; however, it is important to keep in mind that using a particular substance changes its properties. Hazardous constituents not present in an original substance can be added through the process in which it is used, which may make the "used" or "spent" substance a hazardous waste. When many different types of stains, paints, thinners, and varnishes are used, such as in Philo High School's woodworking shop, it becomes more difficult to make a proper waste evaluation of the spent materials based on their combined MSDS information and knowledge of how they are used. Therefore, Philo High School should have the above two wastes tested by an analytical laboratory in order to determine if they are hazardous wastes.

Philo High School must submit a copy of the waste evaluation (analytical laboratory results) to this office.

GENERAL COMMENTS:

- (a) Shop rags that are sent to an industrial laundering service for cleaning and reuse are not regulated as a waste, provided that the rags wipers contain no free liquids and are being sent to a industrial laundry that is subject to regulation under the Clean Water Act. I have enclosed a list of industrial laundry services in Ohio for your reference. Please note in your response letter whether Philo High School will be having the rags laundered or managing them as a waste.
- (b) In Philo High School's chemistry lab, spent chemicals/reagents used in lab tests/experiments (button-sized amounts in small test tubes) are rinsed down sink drains which lead to an on-site package type wastewater treatment plant. Some

chemicals and reagents used in the chemistry lab likely contain metals, volatile and/or semi-volatile organics, etc. which may make the sludge a hazardous waste. In addition, it has come to our attention that materials generated in the woodworking shop were previously poured down the sink drains that lead to the on-site wastewater treatment plant. As we discussed during the inspection, since these possibly hazardous substances have entered the unit, Philo High School must evaluate the wastewater treatment plant sludge to determine if it is a hazardous waste when the sludge is removed from the unit upon cleaning. If the sludge is determined to be a hazardous waste, it cannot go to the City of Zanesville's Wastewater Treatment Plant; it must be managed and disposed of as a hazardous waste at a permitted hazardous waste Treatment, Storage and Disposal facility.

During the inspection, you indicated that you were unsure when and how often the on-site wastewater treatment plant is cleaned out and the sludge is removed. As we discussed, Philo High School should develop and implement a regularly scheduled maintenance plan for the on-site wastewater treatment plant.

If you have any questions regarding maintenance of the on-site wastewater treatment plant or your allowable discharge limits under your NPDES permit, etc., please contact Scott Foster in Ohio EPA's Division of Surface Water, at (740) 380-5227.

- (c) Any wastes generated in Philo High School's chemistry lab, including any spent, left over, or otherwise unusable chemicals or reagents, must be collected and evaluated to determine if they are hazardous wastes prior to their disposal.
- (d) During the inspection, it came to our attention that unused and/or outdated chemicals and reagents generated from the chemistry lab clean at the old Philo High School were taken to a household hazardous waste collection event. As we discussed, please be advised that as a school, Philo High School does not qualify for the household exemption to the hazardous waste regulations. Any hazardous wastes generated by Philo High School must be managed as regulated hazardous waste and disposed of at a permitted hazardous waste Treatment, Storage and Disposal facility.
- (e) Ohio EPA's Office of Compliance Assistance and Pollution Prevention (OCAPP) is an independent, non-regulatory office within Ohio EPA that provides information and resources to help facilities identify and implement pollution prevention measures that can save money and benefit the environment. This office provides a free on-site assessment of a facility's operations to identify and evaluate opportunities to reduce wastes and pollution. If your facility would like to be considered for an on-site pollution prevention assessment, or if you would like more information about pollution prevention assessments, you can contact Ohio EPA's Office of Compliance Assistance and Pollution Prevention at their toll free phone

Mr. Robert Walden
Franklin Local School District
November 23, 2007
Page 4 of 4

number, (800) 329-7518, or by e-mail at p2mail@epa.state.oh.us. You can also find more information about on-site pollution prevention assessments at: <http://www.epa.state.oh.us/ocapp/p2/p2assmnt.html>.

Enclosed, you will find a copy of the checklists that were completed during the inspection. I have also enclosed several publications; including fact sheets regarding wastes commonly generated in woodworking and refinishing shops, how to identify your hazardous waste, a list of paint and coating recyclers, and a list of hazardous waste Treatment, Storage, and Disposal Facilities in Ohio. You can find copies of the rules and other information on our division's web page at <http://www.epa.state.oh.us/dhwm>. Compliance assistance and pollution prevention information and fact sheets are available at <http://www.epa.state.oh.us/ocapp/ocapp.html>.

Should you have any questions or require assistance, please feel free to call me at (740) 380-5237.

Sincerely,



Vicky D. German
Environmental Specialist
Division of Hazardous Waste Management
Ohio EPA, Southeast District Office

VDG/mlm

Enclosure

cc (w/ attachments): Troy Dawson, Principal, Philo High School
cc: (w/o attachments): Scott Foster, Ohio EPA, DSW-SEDO
Dan Smith, Wastewater Superintendent, City of Zanesville
Wastewater Treatment Plant

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.

Ohio Environmental Protection Agency
**RCRA SUBTITLE C SITE
IDENTIFICATION/VERIFICATION FORM**

For Ohio EPA use only

E-mail this completed form to
tammy.mcconnell@epa.state.oh.us or mail it to
Tammy McConnell, Central Office

Site EPA ID No.	EPA ID Number: Non-Notifier							
Site Name	Name: Philo High School					Website: (Optional)		
Site Location Information	Street Address: 4000 Millers Lane							
	City, Town, or Village: Duncan Falls				State: OH			
	County Name: Muskingum				Zip Code: 43734			
Site Land Type (check only one)	Private <input type="checkbox"/>	County <input type="checkbox"/>	District <input type="checkbox"/>	Federal <input type="checkbox"/>	Indian <input type="checkbox"/>	Municipal <input type="checkbox"/>	State <input checked="" type="checkbox"/>	Other <input type="checkbox"/>
NAICS code(s) www.census.gov/epcd/www/naics.html								
Facility Representative Additional names can be recorded in "Comments" below Only provide address information if it is different than the site address	First Name: Robert		MI:		Last Name: Walden			
	Phone Number: (740) 674-5203				Phone Number Extension:			
	E-Mail Address: bobwalden@omeresanet.net							
	Fax Number: (740) 674-5214				Fax Number Extension:			
	Street or P.O. Box: 360 Cedar Street, P.O. Box 428							
	City, Town or Village: Duncan Falls				State: OH		Country: USA	
Legal Owner and Operator of the Site List Additional Owners and/or Operators in the Comment Section or on another copy of this form page	Name of Site's Legal Owner: Franklin Local School District				Date Became Owner (mm/dd/yyyy):			
	Private <input type="checkbox"/>	County <input type="checkbox"/>	District <input type="checkbox"/>	Federal <input type="checkbox"/>	Indian <input type="checkbox"/>	Municipal <input type="checkbox"/>	State <input checked="" type="checkbox"/>	Other <input type="checkbox"/>
	Street or P.O. Box: 360 Cedar Street, P.O. Box 428							
	City, Town or Village: Duncan Falls				Owner Phone #: (740) 674-5203			
	State: OH				Country: USA		Zip Code: 43734	
	Name of Site's Operator: Philo High School				Date Became Operator (mm/dd/yyyy):			
	Private <input type="checkbox"/>	County <input type="checkbox"/>	District <input type="checkbox"/>	Federal <input type="checkbox"/>	Indian <input type="checkbox"/>	Municipal <input type="checkbox"/>	State <input checked="" type="checkbox"/>	Other <input type="checkbox"/>
	Street or P.O. Box: 4000 Millers Lane							
	City, Town or Village: Duncan Falls				Operator Phone #:			
	State: OH				Country: USA		Zip Code: 43734	
Violations Cited?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No							
Type of Generator:								
<input type="checkbox"/> Not Regulated				<input type="checkbox"/> Conditionally Exempt Small Quantity Generator				
<input checked="" type="checkbox"/> UNKNOWN: Cited for violation of 3745-52-11				<input type="checkbox"/> United States Importer of Hazardous Waste				
<input type="checkbox"/> Large Quantity Generator (LQG)				<input type="checkbox"/> Mixed Waste (Hazardous and Radioactive) Generator				
<input type="checkbox"/> Small Quantity Generator (SQG)								
Type of Regulated Waste Activity (Mark "X" in all of the appropriate boxes)								
<input type="checkbox"/> Recycler of Hazardous Waste				<input type="checkbox"/> Exempt Boiler and/or Industrial Furnace				
<input type="checkbox"/> Underground Injection Control Facility				<input type="checkbox"/> Small Quantity On-Site Burner Exemption				
<input type="checkbox"/> Hazardous Waste Transporter				<input type="checkbox"/> Smelting, Melting, Refining Furnace Exemption				
<input type="checkbox"/> Treater, Storer or Disposer of Hazardous Waste								

Universal Waste Activities				
<i>(Indicate types of universal waste generated and/or accumulated (check all boxes that apply))</i>				
<input checked="" type="checkbox"/> Small Quantity Handler of Universal Waste		<input type="checkbox"/> Large Quantity Handler of Universal Waste <i>(accumulates 5,000 kg. or more)</i>		
<input type="checkbox"/> Destination Facility for Universal Waste				
<i>(Check all boxes below that apply for each of the three types of facilities above)</i>		Used Oil Activities <i>(Indicate Type(s) of Activity(ies))</i>		
	Generated	Accumulated	<input type="checkbox"/> Used Oil Generator	<input type="checkbox"/> Off-Specification Used Oil Burner
Batteries	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Used Oil Transporter	<input type="checkbox"/> Used Oil Fuel Marketer Who Directs Shipment of Off-Spec. Oil
Pesticides	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Used Oil Transfer Facility	<input type="checkbox"/> Used Oil Fuel Marketer to Off-Specification Used Oil Burner
Thermostats	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Used Oil Processor	
Lamps	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> Used Oil Re-refiner	
Waste Codes for Federally Regulated Hazardous Wastes. <i>Please list the codes for the federally regulated hazardous waste handled at your site. List them in the order they are presented in the regulations (e.g., D001, D003, F007, U112). Use an additional page if more space is needed. If there are more than 7 waste codes and they are the same as listed in the most recent RCRAInfo source record, you do not need to list them all. Instead just indicate the date of the most recent source record.</i>				
Comments: <i>Use this area to describe whether the inspection was announced, whether the waste is stored in tanks or containers, etc.</i>				
Announced	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Additional Facility Representatives:	Philo High School: Troy Dawson, Principal Mike Dorman, Asst. Principal
Tanks	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	Other Comments:	
Containers	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No		
Name of Inspector(s)		Name of Inspector(s)		Date of Inspection/Time (mm/dd/yyyy) (hh:mm)
Vicky German, DHWM-SEDO		Melody Stewart, DHWM-SEDO		11/8/2007
OPTIONAL CERTIFICATION. <i>I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.</i>				
Signature of Owner, Operator, or an Authorized Representative		Name and Title (Print)		Date (mm/dd/yyyy)

CONDITIONALLY EXEMPT SMALL QUANTITY (CESQG) GENERATOR REQUIREMENTS

CESQG: <100Kg. (Approximately 25-30 gallons) of waste in a calendar month.

SQG: Between 100 and 1,000 Kg. (About 25 to under 300 gallons) of waste in a calendar month.

LQG: >1,000 Kg. (~300 gallons) of waste in a calendar month or >1 Kg. of acutely hazardous waste in a calendar month.

WASTE EVALUATION

1. Have all wastes generated at the facility been adequately evaluated? [3745-52-11] Yes No NA

Philo High School has failed to evaluate wastes generated from the woodworking shop to determine if they are hazardous wastes. When wastes are generated from future clean outs of the chemistry lab and when sludge is generated from periodic maintenance of the on-site wastewater treatment plant, these wastes must also be evaluated prior to their disposal.

GENERATOR CLASSIFICATION

2. Does the generator produce <100 kg. of hazardous waste per month? [conditionally exempt small quantity generator (CESQG)] Yes No NA

Philo High School is likely a CESQG. However, this determination cannot be made until wastes from the woodworking shop generated on a routine basis, and wastes generated periodically from the chemistry lab and maintenance of the on-site wastewater treatment plant, have been evaluated to determine if they are hazardous wastes.

NOTE: If quantities of hazardous waste accumulated on-site at any one time exceed 1,000 Kg. or the generator produces between 100 and 1,000 Kg. of hazardous waste per month, it is operating as a Small Quantity Generator (SQG).

OFF-SITE SHIPMENT OF HAZARDOUS WASTE

3. Does the CESQG ensure delivery of hazardous waste(s) to an off-site permitted TSD? [3734.02(F)] Yes No NA

This determination will be made once Philo High School has determined if wastes generated from the woodworking shop, chemistry lab, and from periodic maintenance of the on-site wastewater treatment plant are hazardous wastes.

TREATMENT OF HAZARDOUS WASTE

4. Does the generator treat hazardous waste in a:
- a. Container that meets 3745-66-70 to 3745-66-77? Yes No NA
 - b. Tank that meets 3745-66-90 to 3745-66-101 except 3745-66-97(C)? Yes No NA
 - c. Drip pad that meets 3745-69-40 to 3745-69-45? Yes No NA
 - d. Containment building that meets 3745-256-100 to 3745-256-102? Yes No NA

Wastes are not treated on-site.

NOTE: If the CESQG conducts treatment they are subject to the LQG requirements.

NOTE: If waste is treated to meet LDRs, use the LDR checklist.

SMALL QUANTITY UNIVERSAL WASTE HANDLER REQUIREMENTS BATTERIES AND LAMPS

*Large Quantity Universal Waste Handler (LQUWH) = 5,000 Kg or more
Small Quantity Universal Waste Handler (SQUWH) = 5,000 Kg or less*

PROHIBITIONS

1. Did the SQUWH dispose of universal waste? [3745-273-11(A)] Yes No NA
2. Did the SQUWH dilute or treat universal waste, except when responding to releases as provided in 3745-273-17 or managing specific wastes as provided in 3745-273-13? [3745-273-11(B)] Yes No NA

WASTE MANAGEMENT - LABELING/MARKING

UNIVERSAL WASTE BATTERIES

3. Are batteries that show evidence of leakage spillage or damage that could cause leaks contained? [3745-273-13(A)(1)] Yes No NA
At the time of the inspection, Philo High School did not have batteries collected/stored on-site.
4. If batteries are contained, are the containers closed and structurally sound, compatible with the contents of the batteries, and lack evidence of leakage, spillage or damage that could cause leakage? [3745-273-13(A)(1)] Yes No NA
5. Does the SQUWH conduct any of the following activities:
- a. Sort batteries by type? Yes No NA
 - b. Mix battery types in one container? Yes No NA
 - c. Discharge batteries to remove the electric charge? Yes No NA
 - d. Regenerate used batteries? Yes No NA
 - e. Disassemble them into individual batteries or cells? Yes No NA
 - f. Remove batteries from consumer products? Yes No NA
 - g. Remove the electrolyte from the battery? Yes No NA
If so, are the casings of the batteries breached, not intact, or open (except to remove the electrolyte)? [3745-273-13(A)(2)] Yes No NA
6. If the electrolyte is removed or other waste generated, has it been determined whether it is a hazardous waste? [3745-273-13(A)(3)] Yes No NA
- a. If the electrolyte or other waste is characteristic, is it managed in compliance with 3745-50 through 3745-69? [3745-273-13(A)(3)(a)] Yes No NA
 - b. If the electrolyte or other waste is not hazardous, is it managed in compliance with applicable law? [3745-273-13(A)(3)(b)] Yes No NA
7. Are the batteries or containers of batteries labeled with the words "Universal Waste – Batteries" or "Waste Batteries" or "Used Batteries"? [3745-273-14(A)] Yes No NA

UNIVERSAL WASTE LAMPS

8. Does the SQGUHW contain lamps in containers or packages that are structurally sound, adequate to prevent breakage, and are compatible with contents of the lamps? Are containers or packages closed and do they lack evidence of leakage, spillage or damage that could cause leakage? [3745-273-13(D)(1)] Yes No NA
9. Are lamps that show evidence of breakage, leakage or damage that could cause a release of mercury or hazardous constituents into the environment immediately cleaned up? Are they placed into a container that is closed, structurally sound, compatible with the contents of the lamps, and lack evidence of leakage spillage or damage that could cause leakage or releases of mercury or hazardous waste constituents to the environment? [3745-273-13(D)(2)] Yes No NA
10. Are the lamps or containers or packages of lamps labeled with the words "Universal Waste – Lamps" or "Waste Lamps" or "Used Lamps"? [3745-273-14(E)] Yes No NA
At the time of the inspection, Philo High School did not have any spent fluorescent lamps collected/stored on-site. When spent lamps are generated, they are boxed, labeled, and taken to the Franklin Local School District's maintenance/administrative location at 360 Cedar Street in Duncan Falls. The spent lamps are managed as a universal waste and taken off-site to SunPro in North Canton OH for recycling.

NOTE: Treatment (such as crushing) by a UWH is prohibited under this rule unless the facility is permitted for such activities [3745-273-31(B)]. A generator crushing lamps must manage lamps according to hazardous waste rules (OAC Chapter 3745-52). Lamp crushing is a form of generator treatment (OAC 3745-52-34). Crushed lamps must be transported by a registered hazardous waste transporter to a permitted hazardous waste facility under a hazardous waste manifest.

ACCUMULATION TIME

NOTE: Accumulation is defined as date generated or date received from another handler.

11. Is the waste accumulated for less than one year? [3745-273-15(A)] If not: Yes No NA
- a. Was the waste accumulated over one year in order to facilitate proper recovery, treatment or disposal? (Burden of proof is on the handler to demonstrate) [3745-273-15(B)] Yes No NA
12. Is the length of time the universal waste is stored documented by one of the following: [3745-273-15(C)]
- a. Marking or labeling the container with the earliest date when the universal waste became a waste or was received? [3745-273-15(C)(1)] Yes No NA
- b. Marking or labeling individual item(s) of universal waste with the earliest date that it became a waste or was received? [3745-273-15(C)(2)] Yes No NA
- c. Maintaining an inventory system on-site that identifies the date the universal waste became a waste or was received? [3745-273-15(C)(3)] Yes No NA
- d. Maintaining an inventory system on-site that identifies the earliest date that any universal waste in a group of universal waste items or a group of containers became a universal waste or was received? [3745-273-15(C)(4)] Yes No NA
- e. Placing the universal waste in a specific accumulation area and identifying the earliest start date or date received? [3745-273-15(C)(5)] Yes No NA
- f. Any other method, which clearly demonstrates, the length of time the universal waste has been accumulated from the date it became a waste or was received? [3745-273-15(C)(6)] Yes No NA

EMPLOYEE TRAINING

13. Are employees who handle or have the responsibility for managing universal waste informed of waste handling/emergency procedures, relative to their responsibilities? [3745-273-16]

Yes No NA

RESPONSE TO RELEASES

14. Are releases of universal waste and other residues immediately contained? [3745-273-17(A)]

Yes No NA

15. Is the material released characterized? [3745-273-17(B)]

Yes No NA

16. If the material released is a hazardous waste, is it managed as required in OAC Chapters 3745-50 through 3745-69? (If the waste is hazardous, the handler is considered the generator of the waste and is subject to Chapter 3745-52) [3745-273-17 (B)]

Yes No NA

OFF-SITE SHIPMENTS

NOTE: If a SQUWH self-transportes waste, then they must comply with the Universal Waste transporter requirements.

17. Are universal wastes sent to either another handler, destination facility or foreign destination? [3745-273-18(A)]

Yes No NA

NOTE: SQUWHs are prohibited to send waste to any other facility.

18. If the universal waste meets the definition of hazardous material under 49 CFR 171-180, are DOT requirements met with regard to package, labels, placards and shipping papers? [3745-273-18(C)]

Yes No NA

19. Prior to shipping universal waste off-site, does the receiver agree to receive the shipment? [3745-273-18(D)]

Yes No NA

20. If the universal waste shipped off-site is rejected by another handler or destination facility does the originating handler do one of the following:

- a. Receive the waste back? [3745-273-18(E)(1)]
b. Agree to where the shipment will be sent? [3745-273-18(E)(2)]

Yes No NA
Yes No NA

21. If a handler rejects a partial or full load from another handler, does the receiving handler contact the originating handler and discuss one of the following:

- a. Sending the waste back to the originating handler? [3745-273-18(F)(1)]
b. Sending the shipment to a destination facility? (If both the originating and receiving handler agree) [3745-273-18(F)(2)]

Yes No NA
Yes No NA

22. If the handler received a shipment of hazardous waste that was not universal waste, did the SQUWH immediately notify Ohio EPA? [3745-273-18(G)]

Yes No NA

23. If the handler received a shipment of nonhazardous, non-universal waste, was the waste managed in accordance with applicable law? [3745-273-18(H)]

Yes No NA

EXPORTS

24. Is waste being sent to a foreign destination? If so:

Yes No NA

a. Does the small quantity handler comply with primary exporter requirements in OAC 3745-52-53, 3745-52-56, and 3745-52-57? [3745-273-20(A)]

Yes No NA

b. Is waste exported only upon consent of the receiving country and in conformance with U.S. EPA's "Acknowledgment of Consent" as defined in 3745-52-50 to 3745-52-57? [3745-273-20(B)]

Yes No NA

c. Is a copy of U.S. EPA's "Acknowledgment of Consent" provided to the transporter? [3745-273-20(C)]

Yes No NA

WASTE ACTIVITIES SUMMARY

Facility Name: Franklin Local School District – Philo High School

Facility Type: CESQG

EPA ID#: Non-Notifier

Waste Generated

On-Site and Off-Site Management

Pollution Prevention Activities

Process Generating Waste	Waste Generated	EPA Waste Code	Amount Generated per Month	Type and Location of Accumulation, Storage	Type of On-Site Treatment	Name, State, and Type of Activity Occurring at the Facility	Current Pollution Prevention Activities	Pollution Prevention Opportunities
1 Chemistry Lab	Outdated reagents and chemicals	*	NA – not routinely generated	NA	NA	NA	NA	* Must be evaluated prior to disposal
2 On-site wastewater treatment (package plant) sludge	Wastewater treatment sludge	*	NA – not routinely generated	NA	NA	Currently taken to City of Zanesville WWTP upon clean out of system	NA	* Must be evaluated prior to disposal
3 Woodworking Shop	Spent solvent and solvent-soaked shop rags	*	*	NA	NA	NA	NA	* Must be evaluated prior to disposal
4 Woodworking Shop	Spent stains, paints, thinners	*	*	NA	NA	NA	NA	* Must be evaluated prior to disposal
5 Woodworking Shop	Paint brushes contaminated with solvent, stains, paints, thinners	*	*	NA	NA	NA	NA	* Must be evaluated prior to disposal
6 Woodworking Shop	Furniture stripping wastes – sludge, paint chips, etc.	*	*	NA	NA	NA	NA	* Must be evaluated prior to disposal

* **Determination will be made upon evaluation of wastes generated.**

WASTE ACTIVITIES SUMMARY (cont.)

Facility Name: Franklin Local School District – Philo High School

Facility Type: CESQG

EPA ID#: Non-Notifier

Waste Generated				On-Site and Off-Site Management			Pollution Prevention Activities	
Process Generating Waste	Waste Generated	EPA Waste Code	Amount Generated per Month	Type and Location of Accumulation, Storage	Type of On-Site Treatment	Name, State, and Type of Activity Occurring at the Facility	Current Pollution Prevention Activities	Pollution Prevention Opportunities
7 Woodworking Shop	Sawdust Wood scraps Wood chips	NA (Solid waste)	Varies	55-G containers	NA	Waste Management Landfilled	NA	NA
8 Building Maintenance	Spent fluorescent lamps	NA (Univ. waste)	Varies – yearly pickup	Accumulated in boxes at Maintenance/ Administration location	NA	SunPro North Canton OH Recycled	Recycled	NA
9								
10								
11								
12								

GENERAL FACILITY INFORMATION

Franklin Local School District was formed from the consolidation of several schools. The district encompasses approximately 190 square miles and serves the communities of Chandlersville, Duncan Falls, Philo and Roseville. Franklin Local School District includes five school buildings; Duncan Falls Elementary, Roseville Elementary, Philo Junior High School, Roseville Middle School, and Philo High School. The administrative office building and transportation/maintenance garage are located at 360 Cedar Street in Duncan Falls.

Philo High School, formerly located in Philo, has been at its current location on Millers Lane in Duncan Falls since approximately November 2006.

PROCESS INFORMATION

Wastes are generated from the chemistry lab, the woodworking shop, and from routine building maintenance, as follows:

Chemistry Lab

Outdated reagents and miscellaneous unusable chemicals
Spent chemicals/reagents used in lab tests /experiments (button-sized amounts in small test tubes) are rinsed down sink drains that lead to an on-site package-type wastewater treatment system

Woodworking Shop

Solvent-soaked shop rags
Spent solvent, spent oil-based stains, thinners, and varnishes
Paint brushes contaminated with Spent solvent, spent oil-based stains, thinners, and varnishes
Furniture stripping wastes (stripper/paint sludges, paint chips, shop rags)

Building Maintenance

Spent fluorescent lamps

On-site Wastewater Treatment System (package plant)

Wastewater treatment plant sludge generated from clean out of on-site unit

REGULATORY HISTORY

File information indicates that Philo High School has not previously been inspected for compliance with Ohio's hazardous waste regulations.

Franklin Local School District's transportation/maintenance garage, located on Cedar Street in Duncan Falls (adjacent to the administration building) was last inspected on March 5, 2007. Violations discovered during the inspection were abated by Franklin Local School District on March 29, 2007.

POLLUTION PREVENTION REMARKS

Would this facility be interested in a Pollution Prevention Assessment? Yes No NA