

**Environmental
Protection Agency**

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

December 27, 2010

Ms. Mary Mayse
Parma Board of Education
5311 Longwood Ave.
Parma, OH 44134-3800

**RE: PARMA BOARD OF EDUCATION, COMPLIANCE EVALUATION
INSPECTION, CONDITIONAL EXEMPT SMALL QUANTITY GENERATOR;
CUYAHOGA COUNTY, NOTICE OF VIOLATION**

Dear Ms. Mayse:

On July 28, 2010, Mr. Bill Lutz and I, representing the Ohio Environmental Protection Agency (EPA), visited the Parma Board of Education (Board) Administration Center at 5311 Longwood Avenue. Our intention was to conduct a hazardous waste compliance inspection to determine the Board's 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). The Board was represented by Mr. James Leigh and you.

The District serves three communities and has 25 facilities; the names and addresses are included in Attachment 1. Included in the list are three high, three middle, and fifteen elementary schools, a Transportation Center, an early education center, the Administration Center at 5311 Longwood Ave., and an alternate usage school. Three of the buildings are currently closed.

Our first meeting occurred on July 28, 2010. At that time, you (Ms. Mayse) had been in your current position for two weeks and your primary responsibility was to schedule transportation for children returning to school. We inspected the Transportation Center and several of the facilities in the District over the course of several inspection dates including, August 31, September 29, and November 2, 2010.

The Board generates hazardous waste, used oil, and universal waste. Waste is generated through activities associated with the Transportation Center (vehicle servicing), when chemicals are discarded from classroom laboratories and art rooms, as a result of building clean outs, and through replacement of spent fluorescent bulbs. During the course of the inspection, it was determined the Board is a conditionally exempt small quantity generator (CESQG) of hazardous waste. However, the Board occasionally fluctuates between generator categories, typically as a result of building or lab clean outs.

In August, 2010, the Board conducted a clean-out of the Central Office Building located at 6726 Ridge Road which was slated for demolition. The waste collected included off specification, out-dated, and unwanted materials and chemicals totaling over 1,000 kg (2200 lbs) of hazardous waste. The waste was observed during the August 31, 2010 inspection and shifted the Board into the large quantity generator (LQG) status. Issues related to LQG requirements and rules evaluated during the August 2010 inspection were covered in a separate letter dated December 21, 2010.

Ohio's hazardous waste rules related to CESQG, universal waste, and used oil requirements were the basis for this inspection and notice of violation (NOV). The violations and concerns observed are listed below. **Please respond within thirty days of the date of this letter with all of the documentation and information requested.** Checklists completed during the inspections have been included in this letter for your review.

VIOLATIONS

1. **OAC rule 3745-52-11. Hazardous Waste Determination.**

Any person who generates a waste in the state of Ohio...shall determine if the waste is a...hazardous waste...

During the inspection of the Transportation Center, we observed aerosol cans in the trash that were not RCRA empty. The Board had not evaluated the waste to determine if it was hazardous or not prior to discarding the cans in the trash. If the waste in the cans was determined to be hazardous, discarding it in the trash would be a violation of ORC 3734.02(F). Unlawful Treatment, Storage, Disposal, or Transportation of Hazardous Waste. The cans were removed from the trash container during the inspection and placed on a shelf until you could oversee the proper disposition of the cans. **Please provide information as to how the cans were managed.**

2. **OAC rule 3745-273-13(D) and 14(E). Universal Waste-Containers.**

A small quantity handler of universal waste must contain any lamp in containers or packages that are structurally sound and adequate to prevent breakage...such containers must be kept closed....

And

Each universal waste lamp or a container or package in which such lamps are contained, must be labeled or marked clearly with the words: "Universal Waste-Lamp(s)"

Spent bulbs observed at the Shiloh facility had been collected and placed in a waste container that did not protect the bulbs from breakage. None of the containers were closed and none were labeled. Also, at the Normandy facility, spent bulbs were in protective containers and labeled, but not closed.

On October 1, 2010 via e-mail communication, the Board provided photographs as confirmation documentation that the "Universal Waste – Lamps" were being managed in accordance with the Universal Waste regulations, i.e., they were in protective containers, labeled, and closed. Please communicate with all personnel handling universal waste the requirements of this rule.

There is no further action required at this time regarding this violation.

3. OAC rule 3745-273-14(A). Universal Waste Labeling/Marking.

A small quantity handler of universal waste must label or mark the universal waste to identify....

(A) Universal waste batteries.... must be labeled or marked clearly with any one of the following phrases:

"Universal Waste - Battery(ies)," or "Waste Battery(ies)," or "Used Battery(ies);"

On July 28, 2010, during the inspection of the Transportation Center, we observed lead acid batteries in a rack, but not labeled. The batteries were recycled through Kirk Batteries, but the labeling requirement of the universal waste rules was not being followed.

In order to **return to compliance**, please confirm in writing and with photographic documentation that the batteries are now being managed in accordance with the Ohio Administrative Code rule 3745-273-14(A). Please communicate with all personnel handling hazardous waste the requirements of this rule.

4. OAC rule 3745-52-34 (C)(1)(b) Labeling of Containers (Satellite Accumulation)

.....marks his containers either with the words "Hazardous Waste" or with other words that identify the contents of the containers.

During the inspection on September 29, 2010 of the Board's laboratories, it was noted that in two accumulation areas, one at the Greenbrier facility and the second at the Valley Forge facility, hazardous wastes were not being managed in accordance with OAC rule 3745-52-34(C)(1)(b). At the Greenbrier facility, numerous small containers of chemicals had been accumulated in a cubby hole within a cupboard. The chemicals were not in a container, they were not segregated, and they were not labeled. At the Valley Forge facility, chemicals were being accumulated in a cupboard and not containerized. This waste was not labeled as hazardous waste.

In order to **return to compliance**, please confirm in writing and with photographic documentation that the lab waste in the two hazardous waste accumulation areas are now being managed in accordance with OAC rule 3745-52-34 (C)(1)(b). Please communicate with all personnel handling hazardous waste the requirements of this rule.

5. **OAC rule 3745-55-73(A) Management of Containers**

A container holding hazardous waste must always be closed during storage, except when it is necessary to add or remove waste. The o/o ensures containers are closed....

During the November 2, 2010 inspection of the Normandy facility, a satellite accumulation container was not closed. The container was marked with the words, "labwaste" and was not full. During the inspection, the container was closed, **abating the violation**. Please communicate with all personnel handling hazardous waste the requirements of this rule.

There is no further action required at this time regarding this violation.

Concerns

1. The Board shipped out 700 lbs. of hazardous waste from the Valley Forge High School facility on September 9, 2010 using a uniform hazardous waste manifest; however, it was shipped off-site without an EPA ID Number for that facility. OAC rule 3745-52-12: EPA ID Number, requires conditionally exempt small quantity generators to notify Ohio EPA if there is a change from CESQG to SQG status and obtain a U.S. EPA identification number for that location.

Please review your records to determine the circumstances under which the waste at the Valley Forge High School was accumulated, i.e., was the waste generated as a one time event or over the course of several months and did the Board accumulate more than 220 lbs (100 kg) of waste during any one month? Also, how long was the waste stored at the Valley Forge facility prior to shipment off site?

2. Upon my request of manifests, land disposal restriction (LDR) notifications, shipping papers, and other documents pursuant to OAC rule 3745-270-07. Testing, tracking, and recordkeeping requirements for generators...., you informed me that, as a result of ensuing legal activities, the documents were not available for review. According to **OAC rule 3745-270-07(A)(8)**, *generators must retain on-site a copy of....documents for at least three years from the date that the waste....was last sent to....treatment, storage, or disposal*. The three year record retention period can be extended if requested by the director of the Ohio EPA. This letter serves as such a request. Upon release of the records, please contact the Ohio EPA so that the record review may be completed.

3. The Board generates electronic waste (E-waste) from many of the facilities within the District. Electronics such as computers, typewriters, and printers, when ready to be discarded, should be recycled or evaluated to determine if they are a hazardous waste. If e-waste becomes a problem in the future, do not hesitate to contact me. Ohio EPA has vender lists of facilities that recycle e-waste.

Please respond within thirty days of the date of this letter with the information requested.

Documents provided to you during the inspection included:

- "Solvent Contaminated Rags and Wipers" article from DHWM Notifier, Spring 2006;
- Example of Emergency information to be posted by the telephone;
- Example Inspection log;
- Summary tables of generator requirements and recordkeeping requirements.

Should you have any questions regarding this letter, please feel free to call me at (330) 963-1279 or via e-mail at patricia.natali@epa.state.oh.us.

Sincerely,



Patricia Natali
Environmental Specialist
Division of Hazardous Waste Management

PN:ddw

Enclosure

cc: Marlene Kinney, DHWM, NEDO
James Leigh, Parma City School District
ec: Frank Popotnik, DHWM, NEDO
Natalie Oryshkewych, DHWM, NEDO
Harry Sarvis, DHWM, CO
Adrienne LaFavre, OCAPP, NEDO

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

ATTACHMENT 1

SCHOOL	ADDRESS	STATUS
Col. John Glenn Elementary School	1300 E. Dartmoor Avenue	Open
Dag Hammarskjold Elementary School	4040 Tamarack Drive	Closed
Dentzler Elementary School	3600 Dentzler Road	Open
Greenbriar Middle School	11810 Huffman Rd.	Open
Greenbriar Annex	11800 Huffman Road	Open
Green Valley Elementary School	2401 West Pleasant Valley Road	Open
Hanna Elementary School	11212 Snow Road	Open
Hillside Middle School	1 Educational Park Drive	Open
John Muir Elementary School	5531 W. 24 th Street	Open
Normandy High School	2500 West Pleasant Valley Road	Open
Parkview Elementary School, Early Ed. Center	5210 Loya Parkway	Open
Parma Park Elementary School	6800 Commonwealth Boulevard	Open
Parma Senior High School	6285 W. 54 th street	Open
Pearl Road Elementary School	6125 Pearl Road	Open
Pleasant Valley Elementary School	9906 West Pleasant Valley Road	Open
Pleasantview Elementary School	7700 Malibu Drive	Closed
Renwood Elementary School	8020 Deerfield Drive	Open
Ridge-Brook Elementary School	7915 Manhattan Avenue	Open
Shiloh Middle School	2303 Grantwood Drive	Open
State Road Elementary School	6121 State Road	Open
Thoreau Park Elementary School	5401 W. 54 th Street	Open
Valley Forge High School	9999 Independence Boulevard	Open
Administration Center	5311 Longwood Avenue	Open
Transportation Center	7600 Day Drive	Open
Arlington School	7377 Chateau Drive	Closed

Send to Central Office <input checked="" type="checkbox"/>	Ohio Environmental Protection Agency RCRA SUBTITLE C SITE IDENTIFICATION/VERIFICATION FORM	For Ohio EPA use only
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Completed verification forms required to be submitted to CO should be e-mailed to paula.canter@epa.state.oh.us.

Site EPA ID No.	EPA ID Number:	
Site Name	Name: Transportation Center	Website: (Optional)
Site Location Information	Street Address: 7600 Day Drive	
Site Land Type (check only one)	City, Town, or Village: Parma	State: OH
NAICS code(s) www.census.gov/epcd/www/naics.html	County Name: Cuyahoga	Zip Code: 44130
	Private <input type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input checked="" type="checkbox"/> State <input type="checkbox"/> Other <input type="checkbox"/>	

Facility Representative	First Name: Mary	MI:	Last Name: Mayse
Additional names can be recorded in number 12	Title: Director of Transportation/Safety Compliance		
Only provide address information if it is different than the site address	Phone Number: 440-886-1866		Phone Number Extension:
	E-Mail Address: maysem@parmacityschools.org		
	Fax Number:		Fax Number Extension:
	Street or P.O. Box: 5311 Longwood Ave		
	City, Town or Village: Parma		Zip Code: 44134
	State: OH		

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: Parma Board of Education		Date Became Owner (mm/dd/yyyy):	
	Owner Type:	Private <input type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input checked="" type="checkbox"/> State <input type="checkbox"/> Other <input type="checkbox"/>		
	Street or P.O. Box: 5311 Longwood Ave.			
	City, Town or Village: Parma		Owner Phone #: 440-885-5300	
	State: OH			
	Country: USA		Zip Code: 44134-3800	
	Name of Site's Operator: Parma Board of Education		Date Became Operator (mm/dd/yyyy):	
	Operator Type:	Private <input type="checkbox"/> County <input type="checkbox"/> District <input type="checkbox"/> Federal <input type="checkbox"/> Indian <input type="checkbox"/> Municipal <input checked="" type="checkbox"/> State <input type="checkbox"/> Other <input type="checkbox"/>		
	Street or P.O. Box: 5311 Longwood Ave.			
	City, Town or Village: Parma		Operator Phone #: 440-885-5300	
	State: OH			
	Country: USA		Zip Code: 44134-3800	

VIOLATIONS CITED?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
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TYPE OF HANDLER - MARK "X" AS APPROPRIATE		
<input type="checkbox"/> Not a HW Generator	<input type="checkbox"/> UNKNOWN: Cited for violation of 3745-52-11 <input type="checkbox"/> Short-Term/Temporary Generator (generates from a short-term or one-time event and not from on-going processes). <i>Check the box for the applicable generator status and provide a comment.</i>	<input type="checkbox"/> Large Quantity Generator (LQG) <input type="checkbox"/> Small Quantity Generator (SQG) <input checked="" type="checkbox"/> Conditionally Exempt Small Quantity Generator <input type="checkbox"/> U.S. Importer of Hazardous Waste <input type="checkbox"/> Mixed Waste (Hazardous and Radioactive) Generator

TYPE OF REGULATED WASTE ACTIVITY (MARK "X" IN ALL OF THE APPROPRIATE BOXES)

- | | |
|---|--|
| <input type="checkbox"/> Hazardous Waste Transporter | <input type="checkbox"/> Exempt Boiler and/or Industrial Furnace |
| <input type="checkbox"/> Hazardous Waste Transfer Facility | <input type="checkbox"/> Small Quantity On-Site Burner Exemption |
| <input type="checkbox"/> Treater, Storer or Disposer of Hazardous Waste | <input type="checkbox"/> Smelting, Melting, Refining Furnace Exemption |
| <input type="checkbox"/> Recycler of Hazardous Waste | <input type="checkbox"/> Underground Injection Control Facility |
| <input type="checkbox"/> 72-Hour Recycler | <input type="checkbox"/> Receives Hazardous Waste from Off-site |

UNIVERSAL WASTE ACTIVITIES (INDICATE TYPES OF UNIVERSAL WASTE MANAGED

(CHECK ALL BOXES THAT APPLY)

- | | |
|---|---|
| <input checked="" type="checkbox"/> Small Quantity Handler of Universal Waste | <input type="checkbox"/> Destination Facility for Universal Waste |
| <input type="checkbox"/> Large Quantity Handler of Universal Waste
(accumulates 5,000 kg. or more) | |

CHECK ALL BOXES BELOW THAT APPLY FOR THE TYPES OF UNIVERSAL WASTE THE FACILITY MANAGES

- Batteries
 Pesticides
 Mercury containing equipment
 Lamps

USED OIL ACTIVITIES (INDICATE TYPE(S) OF ACTIVITY(S))

- Used Oil Generator
 Used Oil Transporter
 Used Oil Transfer Facility
 Used Oil Processor
 Used Oil Re-refiner
 Off-Specification Used Oil Burner
 Used Oil Fuel Marketer who directs shipment of Off-Spec Used Oil
 Used Oil Fuel Marketer who first claims the Used Oil meets the specifications

Eligible Academic Entities with Laboratories: Facility has previously notified that they are opting into managing laboratory hazardous waste pursuant to OAC rules 3745-52-200 through 3745-52-216. Check the box(es) below to indicate the laboratory type.

- College or University
 Teaching hospital that is owned by or has a formal written affiliation agreement with a college or university
 Non-profit Institute that is owned by or has a formal written affiliation agreement with a college or university

Waste Codes for Federally Regulated Hazardous Wastes. Please list the codes for the federally regulated hazardous waste handled at the site. List them in the order they are presented in the regulations (e.g., D001, D003, F007, U112). Use an additional page or list them in the comments if more space is needed. If the waste codes are the same as listed in the most recent RCRAInfo source record, you do not need to list them. Instead just indicate the date of the most recent source record.

COMMENTS: USE THIS AREA TO DESCRIBE WHETHER THE INSPECTION WAS ANNOUNCED, WHETHER THE WASTE IS STORED IN TANKS OR CONTAINERS, ETC.

Announced Yes No Additional Facility Representatives: **James Leigh**
Tanks Yes No
Containers Yes No

Name of Inspector(s)
Patricia Natali

Name of Inspector(s)
Bill Lutz

Date of Inspection/Time
(mm/dd/yyyy) (hh:mm)
07/28 2010

Comments:

Facility generates solvent waste from parts washers, universal waste, used oil, scrap tires, and spent fluorescent bulbs.

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 <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
2.	Did the SQUWH dilute or treat universal waste, except when responding to releases as provided in OAC rule 3745-273-17 or managing specific wastes as provided in OAC rule 3745-273-13? [3745-273-11(B)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
WASTE MANAGEMENT AND 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 <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
4.	If batteries are contained, are the containers closed and structurally sound, compatible with the contents of the battery and lack evidence of leakage, spillage or damage that could cause leakage? [3745-273-13(A)(1)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
5.	Are the casings of the batteries breached, not intact, or open (except to remove the electrolyte)? [3745-273-13(A)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
6.	If the electrolyte is removed or other wastes generated, has it been determined whether the electrolyte or other wastes exhibit a characteristic of hazardous waste? [3745-273-13(A)(3)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
a.	If the electrolyte or other waste is characteristic, is it managed in compliance with OAC Chapters 3745-50 through 3745-69? [3745-273-13(A)(3)(a)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
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 <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
7.	Are the batteries or containers of batteries labeled with the words "Universal Waste - Batteries" or "Waste Battery(ies)" or "Used Battery(ies)"? [3745-273-14(A)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
UNIVERSAL WASTE LAMPS		
8.	Does the SQUWH lamps in containers or packages that are structurally sound, adequate to prevent breakage, and 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 <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
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 <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
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 rule 3745-52-34). Crushed lamps must be transported by a registered hazardous waste transporter to a permitted hazardous waste facility using a hazardous waste manifest.		
10.	Are the lamps or containers or packages of lamps labeled with the words "Universal Waste - Lamp(s)" or "Waste Lamp(s)" or "Used Lamp(s)"? [3745-273-14(E)]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>

Parma Board of Education
 CESQG July 28, 2010



ACCUMULATION TIME		
11.	Is the waste accumulated for less than one year? [3745-273-15(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
a.	If not, is 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)] (this change makes it like the LQUWH checklist)	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
<i>NOTE: Accumulation is defined as date generated or date received from another handler.</i>		
12.	Is the handler able to demonstrate the length of time the universal waste has been accumulated? [3745-273-15(C)] If yes, describe below: <i>The Board provided Certificates of Recycling from Consolidated Electrical Distributors</i>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
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 <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
RESPONSE TO RELEASES		
14.	Are releases of universal waste and other residues immediately contained? [3745-273-17(A)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
15.	Is the material released characterized? [3745-273-17(B)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
16.	If the material released is a hazardous waste, was 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 OAC Chapter 3745-52) [3745-273-17(B)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
OFF-SITE SHIPMENTS		
<i>NOTE: If a SQUWH self-transport waste, then the handler must comply with the Universal Waste transporter requirements.</i>		
17.	Are universal wastes sent to either another handler, destination facility or foreign destination? [3745-273-18(A)]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
18.	Is the handler aware of DOT requirements for packaging and shipping? If no, make aware of 49 CFR 171-180.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
19.	Prior to shipping universal waste off-site, does the originating handler ensure that the receiver agrees to receive the shipment? [3745-273-18(D)] (this change makes it like the LQUWH checklist)	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
20.	Has the originating handler ever had an off-site shipment rejected by another handler or destination facility?	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
a.	If yes, did the originating handler receive the waste back or agree to where the shipment was sent? [3745-273-18(E)(2)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
21.	If a handler rejects a partial or full load from another handler, does the receiving handler contact the originating handler and discuss and do <u>one of the following</u> :	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
a.	Send the waste back to the originating handler or send the shipment to a destination facility (If both the originating and receiving handler agree)? [3745-273-18(F)(2)] (this change makes it like the LQUWH checklist)	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
22.	If the handler received a shipment of hazardous waste that was not a universal waste, did the SQUWH immediately notify Ohio EPA? [3745-273-18(G)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

Parma Board of Education
CESQG July 28, 2010

EXPORTS		
23.	Is waste being sent to a foreign destination? If so:	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
a.	Does the small quantity handler comply with primary exporter requirements in OAC rules 3745-52-53, 3745-52-56, and 3745-52-57? [3745-273-20(A)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
b.	Is waste exported only upon consent of the receiving country and in conformance with the U.S. EPA "Acknowledgment of Consent" as defined in OAC rules 3745-52-50 to 3745-52-57? [3745-273-20(B)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
c.	Is a copy of the U.S. EPA "Acknowledgment of Consent" provided to the transporter? [3745-273-20(C)]	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

Parma Board of Education
CESQG July 28, 2010

PROCESS, WASTE, P2 SUMMARY SHEET

Facility Name: Parma Board of Education; Facility Type: CESQG/Episodic; Date of Inspection: 8/31/10 EPA ED# OHD 077 775 435

Waste Generated			On or Off-Site Management		P2 Activities	
Process/Activity Generating Waste (e.g. plating bath, machining baghouse, painting, general maintenance, etc)	Waste Description (e.g. sludge, solvent, ash, used oil, spent lamps, etc.) and EPA Waste Code, if applicable	QTY. Generated per Month, Type of Accumulation (container, tank, etc.) and location of waste accumulation area	Type of On-Site Treatment (recycle, waste water treatment, etc.)	Name, state, and type of activity occurring at the off-site facility	Current P2 Activities	P2 Opportunities
1 High and Middle School lab cleanouts	Unused, expired chemicals. Waste codes dependent upon chemicals discarded	Varies; chemicals kept in small containers in laboratory until scheduled pickup	None	ChemTron Corp. OHD 066 060 609	None	none
2 Vehicle maintenance	Aerosol cans	Varies; when emptied, they are discarded with trash	Discards with trash	Commercial solid waste company	None	Discard empty cans with scrap metal
3 Building updates	Mercury devices – universal waste	Varies; maintained in small containers in building until scheduled pickup	Recycles	PennOhio Corporation, Ashtabula, OH; (440) 992-7906	Recycles	None
4 Building maintenance	Fluorescent bulbs (spent) – universal waste	Varies; maintained in small containers in building until scheduled pickup	Recycles	Consolidated Electrical Distributers transports the spent bulbs to Fluorescent Recycling, Inc.	Recycles	None
5 Vehicle maintenance	Batteries – universal waste	Varies; stored in racks in the Transportation Center until scheduled pickup	Recycles	Picked up by Kirk Batteries Distribution	Recycles	None

6	Vehicle maintenance	Scrap tires	Quantity generated monthly varies; stored in vehicle service garage;	Recycles	Sylvester Truck and Tire Service, Avon, OH	Recycles	Tires picked up once or twice a week depending upon number
7	Vehicle maintenance	Used oil and transmission fluid	Varies; stored in two aboveground tanks (300 gal) in Transportation Center; also use small containers when servicing vehicles	Recycle and energy recovery	Rice Company OHR 000 001 321	recycles	Waste oil is usually picked up once a year; No P2 opportunities
8	Vehicle maintenance	Parts washers (2), mineral spirits	Approximately 15 gal generated each month; spent solvent stored in parts washers in the Transportation Center	Serviced approximately every 3 weeks	Hukill Chemical Corp OHD 001 926 740	Recycles	None
9	Vehicle maintenance	Antifreeze	Quantity generated each month varies; spent antifreeze is stored in 55 DM nearused oil tanks in Transportation Center	Recycles/reuses	Rice Companies; OHR 000 001 321	Recycles/reuses	None
11	Vehicle maintenance	Rags – not saturated	Quantity generated each month varies	Discards in trash	Commercial solid waste company	None	Supplied info regarding benefits laundering rags

REMARKS – GENERAL INFORMATION

General Process Information: District has 25 facilities: 3 high, 3 middle, and 15 elementary schools, Transportation Center (vehicle garage), early education center, Administration Building, and an annex. Three of the buildings are not in use and the Central Office Building (6726 Ridge Rd) was demolished in September. Spent fluorescent bulbs are kept at each of the buildings and are picked up on an as needed basis. Several of the schools have science labs and art rooms which occasionally generate hazardous waste (chemicals). Although the Board is typically a CESQG, clean-out of buildings, such as the Central Office Building, or labs results in fluctuations between hazardous waste generator categories. For example during the month of August, the Board was a LQG. The Transportation Center generates waste transmission fluids, anti-freeze, cleaning solvents from two parts washers, used oil, batteries, scrap tires, aerosol cans, and cleaning rags, all of which are described above.

Regulatory/Enforcement History (if applicable): None

Additional P2 remarks and information: Provided information about laboratory chemicals, i.e., to try to find alternative use for unwanted chemicals, e.g., Ohio Materials Exchange; to buy chemicals on an "as needed" basis, to substitute non-hazardous materials when possible.

Other: Would like Adrienne LaFavre to do a training session for their maintenance people regarding hazardous materials, e.g., lab chemicals. Gave them her brochure and spoke to her; they will schedule a time and place when convenient.

**CONDITIONALLY EXEMPT SMALL QUANTITY GENERATOR REQUIREMENTS
COMPLETE AND ATTACH A PROCESS, WASTE, P2 SUMMARY SHEET**

CESQG: ≤100Kg. (Approximately 25-30 gallons) of waste in a calendar month or < 1 Kg. of acutely hazardous waste.
 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.
 NOTE: To convert from gallons to pounds: Amount in gallons x Specific Gravity x 8.345 = Amounts in pounds.

Safety Equipment Used:

WASTE EVALUATION

1.	Have all wastes generated at the facility been adequately evaluated? [3745-52-11]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
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GENERATOR CLASSIFICATION

2.	Does the generator produce <100 kg. of hazardous waste per month? [conditionally exempt small quantity generator ("CESQG")]	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
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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"). If so, complete the Small Quantity Generator Requirements checklist.

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 <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
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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 <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
	b. Tank that meets 3745-66-90 to 3745-66-101 except 3745-66-97(C)?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
	c. Drip pads that meet 3745-69-40 to 3745-69-45?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>
	d. Containment building that meets 3745-256-100 to 3745-256-102?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

NOTE: Complete appropriate checklist for each unit.

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

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

MIX HAZARDOUS WASTE WITH USED OIL

5.	Does the CESQG mix its hazardous waste with used oil for the purpose of burning for energy recovery? [3745-51-05(J)] If so:	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>
	a. Does the CESQG manage the mixture in accordance with 3745-279-21?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>

* In August 2010, the Board cleaned out a building
 *, as a result, assumed LQG status. A separate
 inspection was conducted and a letter (NOV/RTC)
 sent 12/21/10.

Parma Board of Education
 July 28, 2010