



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

March 11, 2013

PERRY COUNTY  
GENERAL FILE  
(CROOKSVILLE K-8)  
DMWM/SEDO  
OHR000109892

Mr. Kyle Newton, Superintendent  
Crooksville Exempted Village Schools  
4065 School Drive  
Crooksville, Ohio 43731

Dear Mr. Newton:

On March 5, 2013, Melody Stewart and I inspected Crooksville K-8, located at 12400 Tunnel Hill Road, 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 the violations we found and what you need to do to correct the violations.

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 14 days** of your receipt of this letter:

- (1) **OAC Rule 3745-52-11, Waste Evaluation:** Any person who generates a waste must evaluate the waste to determine if it is a hazardous waste in accordance with the criteria set forth in OAC Chapter 3745-51.

During the inspection it was determined that Crooksville K-8 places spent fluorescent lamps generated by school lighting changes into the solid waste dumpster with their regular trash. Because all fluorescent lamps contain some amount of mercury, the spent lamps generated by Crooksville K-8 could be a hazardous waste. Crooksville K-8 has failed to evaluate their spent fluorescent lamps to determine if they are hazardous waste prior to disposing of them in the trash.

To abate this violation, Crooksville K-8 must evaluate their spent fluorescent lamps to determine if they are considered a hazardous waste. Alternatively, Crooksville K-8 may choose to manage spent fluorescent lamps under Ohio's Universal Waste Rule (UWR). If the spent lamps are managed as "universal waste" and they will be recycled, they do not need to be evaluated to determine if they are hazardous waste. If the spent fluorescent lamps are not recycled, it is your responsibility to evaluate them to determine if they are hazardous prior to their disposal. Under no circumstances should unevaluated spent fluorescent lamps be disposed of in the trash, as this could result in future violations for illegal disposal of a hazardous waste. To demonstrate abatement of this violation, Crooksville Exempted Village Schools must submit to Ohio EPA a written description that details how spent fluorescent

lamps will be managed at Crooksville K-8 and all other schools in the Crooksville Exempted Village School system. The description should include whether the lamps will be tested to determine if they are hazardous or if they will be managed as a universal waste and be recycled; as well as arrangements that have been made with a lamp disposal facility or a lamp recycler. I have enclosed some information about the management of spent fluorescent lamps under the universal waste rule, and a list of fluorescent lamp and ballast recyclers for your use in this matter.

Crooksville Exempted Village Schools needs to immediately take the necessary measures to return to compliance with Ohio's environmental laws. Within **14 days** of your receipt of this letter, Crooksville Exempted Village Schools is requested to provide the requested documentation to this office, including the steps you have taken to abate the violations cited above. Documentation includes written correspondence, updated policies, and photographs (as appropriate), and may be submitted via the postal service or electronically to [vicky.german@epa.ohio.gov](mailto:vicky.german@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, Crooksville Exempted Village Schools is requested to submit written correspondence of the steps that will be taken by date certain to attain compliance.

Enclosed you will find a copy of the checklists that were completed as a result of the inspection. You can find copies of the hazardous waste rules and other information on our division's web page at <http://www.epa.ohio.gov/dhwm/lawsregs.aspx>. Pollution prevention and compliance assistance information can be found at <http://www.epa.ohio.gov/ocapp>.

If you have any questions or need assistance, please contact me at 740-380-5237 or [vicky.german@epa.ohio.gov](mailto:vicky.german@epa.ohio.gov).

Sincerely,



Vicky D. German  
Division of Materials and Waste Management  
Ohio EPA, Southeast District Office

VDG/mr

Enclosure

cc with attachments: Mr. Albert Reed, Maintenance Supervisor  
Crooksville Exempted Village Schools

**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.*

 <p>Environmental Protection Agency</p> <p>Send to Central Office <input checked="" type="checkbox"/></p>	<p><b>Ohio Environmental Protection Agency</b></p> <p><b>RCRA SUBTITLE C SITE IDENTIFICATION/VERIFICATION FORM</b></p>	<p>For Ohio EPA use only</p>
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Completed forms that are required to be submitted to CO should be e-mailed to [RCRAInfoData@epa.ohio.gov](mailto:RCRAInfoData@epa.ohio.gov)

<p><b>Site EPA ID No.</b></p> <p><b>Site Name</b></p> <p><b>Site Location Information</b></p> <p><b>Site Land Type</b> (check only one)</p> <p><b>NAICS codes</b> <a href="http://www.census.gov/epcd/www/naics.html">www.census.gov/epcd/www/naics.html</a></p>	<p>EPA ID Number: <b>OHR000109892</b></p> <p>Name: <b>Crooksville K-8</b> Website (Optional): <a href="http://www.crooksville.k12.oh.us">http://www.crooksville.k12.oh.us</a></p> <p>Street Address: <b>12400 Tunnel Hill Road</b></p> <p>City, Town, or Village: <b>Crooksville</b> State: <b>OH</b></p> <p>County Name: <b>Perry</b> Zip Code: <b>43731</b></p> <p>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"/></p>
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<p><b>Facility Representative</b></p> <p>Additional names can be recorded in comments section.</p> <p>Only provide address information if it is different than the site address.</p>	<p>First Name: <b>Albert (Ab)</b> MI: Last Name: <b>Reed</b></p> <p>Phone Number: <b>740-982-2277</b> Extension:</p> <p>E-Mail Address: <a href="mailto:ab.reed@crooksville.k12.oh.us">ab.reed@crooksville.k12.oh.us</a></p> <p>Fax Number: <b>740-982-3551</b> Fax Number Extension:</p> <p>Street or P.O. Box: <b>12400 Tunnel Hill Road</b></p> <p>City, Town or Village: <b>Crooksville</b> State: <b>OH</b> Zip Code: <b>43731</b></p>
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<p><b>Legal Owner And Operator</b></p> <p>List additional Owners and/or Operators in the Comments Section or on another copy of this page.</p>	<p>Name of Site's Legal Owner: <b>Crooksville Exempted Village School District</b> Date Became Owner (mm/dd/yyyy):</p> <p>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"/></p> <p>Street or P.O. Box: <b>4065 School Drive</b></p> <p>City, Town or Village: <b>Crooksville</b> Owner Phone #: <b>740-982-7040</b></p> <p>State: <b>OH</b> Country: <b>US</b> Zip Code: <b>43731</b></p> <p>Name of Site's Operator: <b>Crooksville Exempted Village School District</b> Date Became Operator:</p> <p>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"/></p> <p>Street or P.O. Box: <b>4065 School Drive</b></p> <p>City, Town or Village: <b>Crooksville</b> Operator Phone #: <b>740-982-7040</b></p> <p>State: <b>OH</b> Country: <b>US</b> Zip Code: <b>43731</b></p>
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<p><b>VIOLATIONS CITED?</b></p>	<p><input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>
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<p><b>TYPE OF HANDLER (MARK AS APPROPRIATE)</b></p>		
<p><input type="checkbox"/> Not a HW Generator</p>	<p><input type="checkbox"/> UNKNOWN: Cited for violation of 3745-52-11</p> <p><input type="checkbox"/> Short-Term/Temporary Generator (short-term or one-time event and not from on-going processes). Check the box for the applicable generator status and provide a comment.</p>	<p><input type="checkbox"/> Large Quantity Generator (LQG)</p> <p><input type="checkbox"/> Small Quantity Generator (SQG)</p> <p><input checked="" type="checkbox"/> Conditionally Exempt Small Quantity Generator</p> <p><input type="checkbox"/> U.S. Importer of Hazardous Waste</p> <p><input type="checkbox"/> Mixed Waste (Hazardous and Radioactive) Generator</p>

<b>TYPE OF REGULATED WASTE ACTIVITY (MARK AS APPROPRIATE)</b>	
<input type="checkbox"/> Hazardous Waste Transporter <input type="checkbox"/> Hazardous Waste Transfer Facility <input type="checkbox"/> Treater, Storer, or Disposer of Hazardous Waste <input type="checkbox"/> Recycler of Hazardous Waste <input type="checkbox"/> 72-Hour Recycler	<input type="checkbox"/> Exempt Boiler and/or Industrial Furnace <input type="checkbox"/> Small Quantity On-Site Burner Exemption <input type="checkbox"/> Smelting, Melting, Refining Furnace Exemption <input type="checkbox"/> Underground Injection Control Facility <input type="checkbox"/> Receives Hazardous Waste from Off-site
<b>UNIVERSAL WASTE ACTIVITIES (MARK AS APPROPRIATE)</b>	
<input checked="" type="checkbox"/> Small Quantity Handler of Universal Waste <input type="checkbox"/> Large Quantity Handler of Universal Waste (accumulates 5,000 kg. or more)	<input type="checkbox"/> Destination Facility for Universal Waste
<b>TYPES OF UNIVERSAL WASTE THE FACILITY MANAGES (MARK ALL THAT APPLY)</b>	
<input type="checkbox"/> Batteries <input type="checkbox"/> Pesticides <input type="checkbox"/> Mercury containing equipment <input checked="" type="checkbox"/> Lamps	
<b>USED OIL ACTIVITIES (MARK ALL THAT APPLY)</b>	
<input type="checkbox"/> Used Oil Generator <input type="checkbox"/> Used Oil Transporter <input type="checkbox"/> Used Oil Transfer Facility <input type="checkbox"/> Used Oil Processor <input type="checkbox"/> Used Oil Re-refiner <input type="checkbox"/> Off-Specification Used Oil Burner <input type="checkbox"/> Used Oil Fuel Marketer who directs shipment of Off-Spec Used Oil <input type="checkbox"/> Used Oil Fuel Marketer who first claims the Used Oil meets the specifications	
<b>Eligible Academic Entities with Laboratories:</b> 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 boxes below to indicate the laboratory type.	
<input type="checkbox"/> College or University <input type="checkbox"/> Teaching hospital that is owned by or has a formal written affiliation agreement with a college or university <input type="checkbox"/> Non-profit Institute that is owned by or has a formal written affiliation agreement with a college or university	
<b>Waste Codes for Federally Regulated Hazardous Wastes:</b> List the codes for the federally regulated hazardous waste handled at the site, in the order they are presented in the regulations (e.g., D001, D003, F007, U112). If there are more than 7 waste codes and they are the same as listed in the most recent RCRA Info source record, you do not need to list them all; just indicate the date of the most recent source record.	
D009	
<b>COMMENTS: Use this area to describe inspection conditions and additional information.</b>	
Announced <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Tanks <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No Containers <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Additional Facility Representatives: <b>Kyle Newton, Superintendent</b>
<b>ADDITIONAL COMMENTS:</b>	
Latitude/Longitude: 39.740283, -82.100826	
<b>INSPECTOR(S)</b>	<b>INSPECTION DATE/TIME</b>
Vicky German, DMWM-SEDO	Melody Stewart, DMWM-SEDO
	3/5/13

## **PROCESS INFORMATION AND WASTE ACTIVITIES SUMMARY**

### **GENERAL FACILITY INFORMATION**



The Crooksville Exempt Village School complex includes the Primary School (grades 1 through 3), Intermediate School (grades 4 through 7), and High School (grades 8 through 12) which are located on Tunnel Hill Road. The Administration Office is located on School Drive.

### **WASTES GENERATED**

Building maintenance generates spent fluorescent lamps and ballasts.

### **REGULATORY HISTORY**

Crooksville K-8 notified EPA of its hazardous waste generation activities as a Conditionally Exempt Small Quantity Generator (CESQG) on 7/11/2002. File information indicates that the facility has not previously been inspected for compliance with Ohio's hazardous waste regulations.

## 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

*Crooksville K-8 has not evaluated spent fluorescent lamps prior to disposing of them.*

### GENERATOR CLASSIFICATION

2. Does the generator produce <100 kg. of hazardous waste per month? (CESQG - Conditionally Exempt Small Quantity Generator) Yes  No  NA

**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? [ORC §3734.02(F)] Yes  No  NA

*Crooksville K-8 has not evaluated spent fluorescent lamps prior to disposing of them. Once the lamps have been evaluated or it has been determined that spent lamps will be managed as universal waste and recycled, Crooksville K-8 must maintain documentation demonstrating that spent lamps have been properly disposed or recycled.*

### 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

**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.**