



State of Ohio Environmental Protection Agency

Southeast District Office

2195 Front Street
Logan, Ohio 43138

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www.epa.state.oh.us

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

October 15, 2007

**COSHOCTON COUNTY
GENERAL FILE
(CENTRAL ELEMENTARY SCHOOL)
DHWM/SEDO
NON-NOTIFIER**

Dr. David Hire
Superintendent
Coshocton City School District
1207 Cambridge Road
Coshocton, Ohio 43812

Dear Mr. Hire:

On September 26, 2007, I performed an inspection to determine Central Elementary School's compliance with Ohio's hazardous waste laws regulations as found in Chapter 3734 of the Ohio Revised Code (ORC) and Chapter 3745 of the Ohio Administrative Code (OAC).

Based on this inspection, the following violations of the hazardous waste rules were found:

52-11

- (1) **OAC rule 273-11(A), Prohibitions-standards for small quantity handlers of universal waste:** A small quantity handler of universal waste is prohibited from disposing of universal waste; ...

We observed that spent lamps are disposed with solid waste. Spent fluorescent bulbs (see attached factsheet) and batteries from emergency lighting must be collected and stored properly prior to off-site transportation to appropriate recycling facilities. To demonstrate compliance, provide the name and address of the recycling facility (ies) that will recycle these wastes.

Comments:

- (a) Please provide photographs demonstrating that all batteries and spent lamps are accumulated in proper containers (to prevent breakage or leakage) and which are properly labeled and dated. Please see the attached checklist or factsheet for additional details regarding the management of these wastes.
- (b) These same violations were cited for Coshocton High School in 2005. Please provide documentation (such as a copy of a district-wide policy) that instructs personnel at all schools in the district on compliance with these rules.

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- (c) Spent ballasts from lighting fixtures are also generated occasionally at the school. Ballasts manufactured before 1976 contain PCBs and can leak their contents. These ballasts should be collected in appropriate containers and sent to appropriate disposal facilities (see attached list of bulb and ballast facilities).

Please provide the documentation requested above within **thirty days** of the date of your receipt of this letter.

If you have any questions regarding waste management or pollution prevention activities, please call me at (740) 380-5278.

Sincerely,



Richard Stewart
District Representative
Division of Hazardous Waste Management

RS/mlm

Enclosures

cc (w/enc): Grant Fauver, Central Elementary School

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: Central Elementary School | | | | Website: (Optional) | | | | |
| Site Location Information | Street Address: 724 Walnut Street | | | | | | | | |
| | City, Town, or Village: Coshocton | | | | State: OH | | | | |
| | County Name: Coshocton | | | | Zip Code: 43812 | | | | |
| 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 checked="" type="checkbox"/> | State <input type="checkbox"/> | Other <input type="checkbox"/> | |
| NAICS code(s) www.census.gov/epcd/www/naics.html | | | | | | | | | |
| Facility Representative Additional names can be recorded in number 12 Only provide address information if it is different than the site address | First Name: John | | | MI: | Last Name: McPeek | | | | |
| | Phone Number: 740-291-8275 | | | | Phone Number Extension: | | | | |
| | E-Mail Address: | | | | | | | | |
| | Fax Number: | | | | Fax Number Extension: | | | | |
| | Street or P.O. Box: Same | | | | | | | | |
| | City, Town or Village: | | | | | | | | |
| | State: | | | Country: | | Zip Code: | | | |
| 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: Coshocton City School District | | | | 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: | | | | | | | | |
| | City, Town or Village: | | | | Owner Phone #: | | | | |
| | State: OH | | | | Country: | | Zip Code: | | |
| | Name of Site's Operator: | | | | Date Became Operator (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 type="checkbox"/> | State <input type="checkbox"/> | Other <input type="checkbox"/> |
| | Street or P.O. Box: | | | | | | | | |
| | City, Town or Village: | | | | Operator Phone #: | | | | |
| | State: | | | | Country: | | Zip Code: | | |
| Violations Cited? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No | | | | | | | | |
| Type of Generator | | | | | | | | | |
| <input type="checkbox"/> Not Regulated | | | | <input checked="" type="checkbox"/> Conditionally Exempt Small Quantity Generator | | | | | |
| <input 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 (Indicate types of universal waste generated and/or accumulated (check all boxes that apply)) | | | | | |
| <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 | | | | | |
| (Check all boxes below that apply for each of the three types of facilities above) | | | Used Oil Activities (Indicate Type(s) of Activity(ies)) | | |
| | Generated | Accumulated | <input type="checkbox"/> Used Oil Generator | <input type="checkbox"/> Off-Specification Used Oil Burner | |
| Batteries | <input checked="" 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. 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. | | | | | |
| D008 | D009 | | | | |
| Comments: Use this area to describe whether the inspection was announced, whether the waste is stored in tanks or containers, etc. | | | | | |
| Announced | <input type="checkbox"/> Yes | <input checked="" type="checkbox"/> No | Additional Facility Representatives: | | |
| 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) | |
| Rich Stewart | | | | 10/10/2007 12:00-12:30 | |
| OPTIONAL CERTIFICATION: 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. | | | | | |
| Signature of Owner, Operator, or an Authorized Representative | | Name and Title (Print) | | Date (mm/dd/yyyy) | |
| | | | | | |

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 N/A RMK# 1
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 N/A RMK#

WASTE MANAGEMENT & LABELING/MARKING

UNIVERSAL WASTE BATTERIES

3. Are battery(ies) that show evidence of leakage, spillage or damage that could cause leaks contained? [3745-273-13(A)(1)] Yes No N/A RMK#
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 No N/A RMK#
5. Does the SQUWH conduct any of the following activities:
- a. Sort batteries by type? Yes No N/A RMK#
 - b. Mix battery types in one container? Yes No N/A RMK#
 - c. Discharge batteries to remove the electric charge? Yes No N/A RMK#
 - d. Regenerated used batteries? Yes No N/A RMK#
 - e. Disassemble them into individual batteries or cells? Yes No N/A RMK#
 - f. Remove batteries from consumer products? Yes No N/A RMK#
 - g. Remove the electrolyte from the battery? Yes No N/A RMK#

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 ___ N/A RMK#

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 ___ N/A RMK#

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 ___ N/A RMK#

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 ___ N/A RMK#

7. Are the battery(ies) of container(s) of batteries labeled with the words "Universal Waste - Batteries" or "Waste Battery(ies)" or "Used Battery(ies)"? [3745-273-14(A)]

Yes ___ No ___ N/A RMK#

UNIVERSAL WASTE LAMPS

8. Does the SQGUWH 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 N/A ___ RMK# 1

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 ___ N/A RMK#

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 ___ No ___ N/A RMK#

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

11. Is the waste accumulated for less than one year? Yes___ No_ N/A RMK#
[3745-273-15(A)] If not:
- 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 ___ N/A RMK#

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

REMARKS:

- 1) Central Elementary disposes of lead acid batteries for emergency lighting and spent fluorescent bulbs.

12. Is the length of time the universal waste is stored documented by one of the following: [3745-273-15(C)]

Yes ___ No ___ N/A RMK#

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 ___ N/A RMK#

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 ___ N/A RMK#

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 ___ N/A RMK#

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 ___ N/A RMK#

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 ___ N/A RMK#

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 ___ N/A RMK#

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 ___ N/A ___ RMK#

RESPONSE TO RELEASES

14. Are releases of universal waste and other residues immediately contained? [3745-273-17(A)] Yes No ___ N/A ___ RMK#
15. Is the material released characterized? [3745-273-17(B)] Yes No ___ N/A ___ RMK#
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 ___ N/A ___ RMK#

OFF-SITE SHIPMENTS

NOTE: *If a SQUWH self-transport 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 ___ N/A ___ RMK# 1

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 ___ N/A RMK#
19. Prior to shipping universal waste off-site, does the receiver agree to receive the shipment? [3745-273-18(D)] Yes ___ No ___ N/A RMK#
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)] Yes ___ No ___ N/A RMK#

- b. Agree to where the shipment will be sent? [3745-273-18(E)(2)] Yes ___ No ___ N/A RMK#
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: Yes ___ No ___ N/A RMK#
- a. Sending the waste back to the originating handler? [3745-273-18(F)(1)] Yes ___ No ___ N/A RMK#
- b. Sending the shipment to a destination facility? (If both the originating and receiving handler agree) [3745-273-18(F)(2)] Yes ___ No ___ N/A RMK#
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 ___ N/A RMK#
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 ___ N/A RMK#

EXPORTS

24. Is waste being sent to a foreign destination? If so: Yes ___ No N/A ___ RMK#
- 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 ___ N/A RMK#
- 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 -52-57? [3745-273-20(B)] Yes ___ No ___ N/A RMK#
- c. Is a copy of U.S. EPA's "Acknowledgment of Consent" provided to the transporter? [3745-273-20(C)] Yes ___ No ___ N/A RMK#

REMARKS

PROCESS, WASTE, P2 SUMMARY SHEET

Facility Name: Central Elementary Facility Type: LQG SQG CESQG TSD Date of Inspection: 10/10/07 EPA ID#: Non-Not

| 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 applic. | QTY Generated per Month, Type of Accumulation (container, tank, etc) and location of waste accumulation area | Type of On-Site Treatment (recycle, wwt, etc) | Name, state, and type of activity occurring at the off-site facility. | Current P2 Activities | P2 Opportunities |
| 1 | lighting | spent bulbs | several | NA | local SW landfill | recycle as Universal waste |
| 2 | lighting | spent batteries | varies | NA | local SW landfill | recycle as Universal waste |
| 3 | | | | | | |
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REMARKS-GENERAL INFORMATION

General Process Information:

Central elementary is a public school built in the 1913. Wastes are generated from building maintenance.

Regulatory/Enforcement History (if applicable):

No information on this facility was found in DHWM's files.

Additional P2 remarks and information:

Would this facility be interested in a P2 assessment? Yes* No *If yes, refer promptly to your district P2 coordinator.

Office of Compliance Assistance and Pollution Prevention - 1-800-329-7518 or p2mail@epa.state.oh.us or www.epa.state.oh.us/ocapp/ocapp.html

Other: