

Jeb Bush  
Governor

# Department of Environmental Protection

Central District  
3319 Maguire Boulevard, Suite 232  
Orlando, Florida 32803-3767

David B. Struhs  
Secretary

January 22, 2003

CERTIFIED MAIL

7001 2510 0002 4340 9527

Mr. Bob Ahmadi  
Photographic Waste Control  
1943 High Street  
Longwood, Florida 32750

OCD-HW-C-03-0026

Seminole County - HW  
Photographic Waste Control

Dear Mr. Ahmadi:

A hazardous waste compliance inspection was conducted at your facility on August 7, 2002. This inspection was conducted under the authority of Section 403.091, Florida Statutes, and Chapter 403, Part IV, Florida Statutes. The inspection is designed to ascertain the compliance status of your facility with 40 CFR 260-268, adopted in Florida Administrative Code Chapter 62-730. The attached RCRA Compliance Inspection Report, indicates that at this time the hazardous waste classification of your facility is a hazardous waste transporter, transfer facility, and small quantity generator and is in compliance.

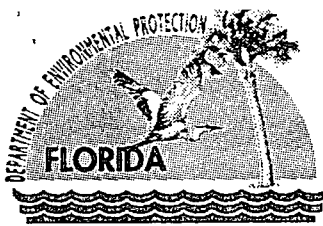
If you have any questions, please contact me, at (407) 893-3323.

Sincerely,

William Kappler  
Environmental Specialist  
Hazardous Waste

WK

Enclosure: RCRA Inspection Report



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## HAZARDOUS WASTE INSPECTION REPORT

1. **INSPECTION TYPE:** ☒ Routine ☐ Complaint ☐ Follow-Up ☐ Permitting ☐ Pre-Arranged

FACILITY NAME Photographic Waste Control EPA ID # FLD984229609

STREET ADDRESS 1943 High Street, Longwood, Florida 32750

MAILING ADDRESS 1943 High Street, Longwood, Florida 32750

COUNTY Seminole PHONE (407) 328-9651 DATE 8/7/02 TIME 10:11am

NOTIFIED AS: ☐ N/A

- ☐ Non Handler
- ☐ CESQG (<100 kg/mo.)
- ☒ SQG (100-1000 kg/mo.)
- ☐ Generator (>1000 kg/mo.)
- ☒ Transporter
- ☒ Transfer Facility
- ☐ Interim Status TSD Facility
- ☐ TSD Facility
- Unit Type(s):
- ☐ Exempt Treatment Facility
- ☐ Used Oil:

CURRENT STATUS:

- ☐ Non Handler
- ☐ CESQG (<100 kg/mo.)
- ☒ SQG (100-1000 kg/mo.)
- ☐ Generator (>1000 kg/mo.)
- ☒ Transporter
- ☒ Transfer Facility
- ☐ Interim Status TSD Facility
- ☐ TSD Facility
- Unit Type(s):
- ☐ Exempt Treatment Facility
- ☒ Used Oil:

2. **APPLICABLE REGULATIONS:**

- |  |  |  |   |
|--|--|--|---|
| <input type="checkbox"/> 40 CFR 261.5          | <input checked="" type="checkbox"/> 40 CFR 262 | <input type="checkbox"/> 40 CFR 263            | <input type="checkbox"/> 40 CFR 264             |
| <input checked="" type="checkbox"/> 40 CFR 265 | <input type="checkbox"/> 40 CFR 266            | <input checked="" type="checkbox"/> 40 CFR 268 | <input type="checkbox"/> 40 CFR 273             |
| <input checked="" type="checkbox"/> 40 CFR 279 | <input type="checkbox"/> 62-710, FAC           | <input type="checkbox"/> 62-737, FAC           | <input checked="" type="checkbox"/> 62-730, FAC |

3. **RESPONSIBLE OFFICIAL(s):**

Bob Ahmadi, CEO

4. **INSPECTION PARTICIPANTS:**

William Kappler, FDEP  
Nancy McKee, FDEP  
Danielle Spear, Seminole County

Barbara Simboli, Photographic Waste  
Bob Ahmadi, Photographic Waste

5. **LATITUDE/LONGITUDE:**

6. **SIC Code:** 7384

7. **TYPE OF OWNERSHIP:** Private Federal State County Municipal

8. **PERMIT #:** N/A

**ISSUE DATE:**

**EXP. DATE:**

"More Protection, Less Process"

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## **9. INTRODUCTION**

On August 7, 2002, William Kappler and Nancy McKee (inspectors) of the Florida Department of Environmental Protection (FDEP) and Danielle Spear of Seminole County inspected Photographic Waste Control (PWC) for compliance with hazardous waste rules and regulations. Bob Ahmadi and Barbara Simboli accompanied inspectors.

The facility is located at 1943 High Street, Longwood, Seminole County, Florida. PWC employs 4 people. Sanitary sewer and potable water services is provided by the City of Longwood. PWC notified as a small quantity generator, transporter, and transfer facility on January 8, 1992.

## **10. INSPECTION HISTORY**

PWC was last inspected on June 20, 1995. The facility was cited for not performing a waste determination on waste sludge and liquid generated by the Licon, 40 CFR 262.11.

Additionally the Department recommended that the facility maintain a written record on all hazardous waste entering and leaving the facility, 62-730.171(2)(e).

## **11. PROCESS DESCRIPTION**

Photographic Waste Control is a hazardous waste transporter and transfer facility which services small businesses generating waste photographic chemicals and related materials.

Waste photographic fixer, developer, toner, spent photo-processing chemicals, and waste inks are transported from generator locations to the transfer facility, which also houses the silver recovery operation.

Spent photographic fixer containers are emptied into one 500-gallon above ground tank and photographic developer into a second 500-gallon above ground tank. The spent fixer, which contains silver, is processed through Mark 26 recovery columns to remove the silver. The processed fixer waste then accumulates in a 500-gallon holding tank. The processed fixer is laboratory tested one time per month. Generally the test results show a silver concentration of 1 to 3 mg/L.

PWC no longer uses the Licon vacuum evaporator. Use of the vacuum evaporator was discontinued in March 1997.

## **12. INSPECTION**

Inspection of the spent photographic waste area found numerous containers accumulating prior to treatment. Inspectors observed 19 55-gallon drums of spent fixer, 28 five-gallon containers of spent fixer, three 10-gallon containers of spent fixer, and one 20-gallon container of spent fixer. The containers are labeled as hazardous waste, marked with the name of the facility generating the waste, and with the D011 waste code. Inspectors also observed three 5-gallon containers of spent developer possibly contaminated with fixer. PWC is waiting for the laboratory report on samples obtained from the containers.

Inspection of the hazardous waste drum area found one 55-gallon drum of waste corrosive liquid (D002), three 55-gallon drums of waste flammable liquid (D001), one 55-gallon drum of nonhazardous waste ink, and one 55-gallon drum of nonhazardous waste U.V. coating solution.

The drums are labeled as hazardous waste, closed, and marked with the dates in July or August 2002.

Inspectors observed containers of used oil not marked or labeled as used oil, **40 CFR 279.22(c)(1)**. Containers used to store used oil at generator facilities must be labeled or marked clearly as used oil. Label or mark all containers of used oil with the words "used oil".

Inspectors also observed nine 55-gallon drum of treated fixer and spent developer accumulating prior to off-site shipment.

#### Waste Management

PWC manages waste fixer and waste developer in containers for processing in its filtration system for silver reclamation.

PCW transports wastewater generated from silver reclamation operations and spent developer to IWS (FLD984229609) located in Jacksonville, Florida. The wastewater and developer is transported in a 4800-gallon tanker.

Petrotech Southeast (FLD982108136) transports used oil and oily water for reclamation.

Mercury lamps and alkaline batteries are shipped to AERC (FLD984262782) located in Melbourne, Florida.

Hazardous waste is transported by PWC to Perma-Fix (FLD980711071) located in Gainesville, Florida.

PWC also uses Freehold Cartage, Inc (NJD054126164) to transport hazardous waste.

#### Record Review

##### **Manifests**

Inspectors reviewed 12 manifests from March 2001 to August 2002.

PWC did not keep a copy of each manifest signed in accordance with 40 CFR 262.23(a) for three years or until the facility received a signed copy from the designated facility which received the waste. PWC did not retain several signed manifests from the TSDF that accepted the waste, 40 CFR 262.40(a).

##### **Waste Analysis**

Inspectors reviewed the most recent waste analysis report dated July 26, 2002 for fixer wastewater. The laboratory report results showed a total silver concentration of 2380 ug/L and 1380 ug/L on wastewater shipped to IWS.

##### **Contingency Plan**

PWC has a Contingency Plan and updated the plan during the first quarter of 2001. Mr. Bob

Ahmadi is the primary emergency coordinator. PWC personnel explained to inspectors that the Contingency Plan was hand delivered to the local authorities.

**Arrangements with Local Authorities**

PWC's contingency plan described the arrangements with local authorities, however the arrangements were not documented, 40 CFR 265.37.

**Weekly Written Inspection Logs**

PWC visually inspects drums of hazardous waste daily. The inspections are not documented, 62-730.160(6), FAC.

**Personnel Training Records**

PWC personnel are given a 40 hour course in Hazardous Waste Operations and Emergency Response (29 CFR 1910.120). The course is presented by Perma-Fix of Florida.

Bob Ahmadi, Barbara Simboli, Robert Santiago, Scott Johnson, and John Nicolosi were trained on October 12, 2001. Additional training certificates were reviewed for personnel training in 2000 and 1999.

**Closure Plan**

PWC has a written closure plan to close the transfer facility. The plan appeared satisfactory.

**Transfer Facility Written Record**

PWC did not maintain a written record of when all hazardous waste enters and leaves the facility, 62-730.171(2)(e), FAC.

Review of the PWC's transporter insurance and transfer facility notification paperwork found no violations.

**Land Ban**

PWC generates corrosive and toxic characteristic hazardous waste and listed hazardous waste that are restricted from land disposal.

**13. SUMMARY OF POTENTIAL NONCOMPLIANCE ITEM & CORRECTIVE ACTION**

**a. Regulation: 40 CFR 262.40(a) - Manifest**

A generator must keep a copy of each manifest signed in accordance with 40 CFR 262.23(a) for three years or until he receives a signed copy from the designated facility which received the waste. This signed copy must be retained as a record for at least three years from the date the waste was accepted by the initial transporter. PWC did not obtain several signed manifests from the TSDF that accepted the waste.

**Corrective Action:** Contact the TSDF and obtain the signed manifests.

b. Regulation: 40 CFR 265.37 - Preparedness and Prevention

The generator must attempt to make arrangements to familiarize police, fire departments, hospitals, and emergency response teams with characteristics of the facility. PWC did not document the arrangements made with the local authorities.

Corrective Action: PWC submitted written information dated August 16 and 22, 2002 they made arrangements with the local authorities.

c. Regulation: 62.730.160(6), FAC - Weekly Inspections

Generators of hazardous waste who accumulate hazardous waste on-site under 40 CFR 262.34, shall maintain written documentation of the inspections required under 40 CFR Part 265.

Corrective Action: PWC submitted written information dated August 16, 2002 they are documenting inspections.

d. Regulation: 62.730.171(2)(e), FAC - Transfer Facility Written Record

The owner/operator of a transfer facility shall maintain a written record of when all hazardous waste enters and leaves the facility.

Corrective Action: PWC submitted written information dated August 7 and 8, 2002 they have established and are maintaining a written record.

Recommendation

1. Drums picked up from CESQG's should have the name and other identifying information of the generator on the drum label. This will allow the facility to identify the generator if a problem should be found with a container or the waste.

**14. CONCLUSION**

PWC was inspected as a small quantity generator of hazardous waste, transporter, and transfer facility and was not in compliance at the time of the inspection. Corrective action documentation submitted subsequent to the inspection is satisfactory and is in compliance.

Report Prepared By:

William Kappler  
William Kappler  
Environmental Specialist

Date: 1/22/03

WK