

Jeb Bush
Governor

Department of Environmental Protection

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

Colleen Castille
Secretary

December 15, 2004

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

OCD-HW/C-04-0442

Seminole County – HW
Photographic Waste Control
RCRA Inspection Report

Dear Mr. Ahmadi:

A hazardous waste compliance inspection was conducted at your facility on September 21, 2004. This inspection was conducted under the authority of Section 403.091, Florida Statutes, and Chapter 403, Part IV, Florida Statutes. This inspection is designed to ascertain the compliance status of your facility with 40 CFR Parts 260-268, and 279 as adopted in Florida Administrative Code Chapters 62-730 and 62-710.

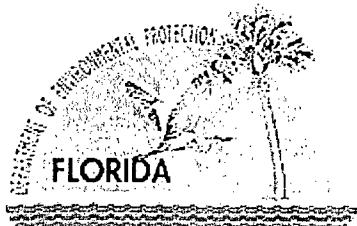
The attached inspection report indicates that, at the time of the inspection, Photographic Waste Control was a hazardous waste transporter and transfer facility. The report also indicates there are "Areas of Concern" with regards to the storage of ignitable waste and the potential need for a solid waste transfer facility permit. Please address these concerns and provide a response within 15 days of receipt of this request.

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

Sincerely,

Lu Burson
Environmental Manager

LB/jw



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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

EMAIL ADDRESS Same as above

COUNTY Seminole PHONE (407)328-9651 DATE 9-21-04 TIME 1310

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 –
photographic waste
☐ Used Oil: Generator

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 –
photographic waste
☐ Used Oil: Generator

2. **APPLICABLE REGULATIONS:**

- | | | | |
|---------------------------------------|--------------------------------------|--|---|
| <input type="checkbox"/> 40 CFR 261.5 | <input type="checkbox"/> 40 CFR 262 | <input checked="" type="checkbox"/> 40 CFR 263 | <input type="checkbox"/> 40 CFR 264 |
| <input type="checkbox"/> 40 CFR 265 | <input type="checkbox"/> 40 CFR 266 | <input type="checkbox"/> 40 CFR 268 | <input type="checkbox"/> 40 CFR 273 |
| <input 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):**

Mr. Bob Ahmadi, CEO

4. **INSPECTION PARTICIPANTS:**

John White – FDEP Bahram Ahmadi – Photographic Waste Control

5. **SIC Code:** 7389 - Business Services, NEC

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

7. **LATITUDE/LONGITUDE:** 28° 43' 35.31" / 81° 18' 26.53"

8. **PERMITS:** NA

9. Introduction

On September 21, 2004, John White, Florida Department of Environmental Protection, accompanied by Mr. Ahmadi, President of Photographic Waste Control, Inc., inspected Photographic Waste Control, Inc. (PWC) for compliance with hazardous waste rules and regulations.

PWC is located in an industrial park at 1943 High Street, Longwood, Seminole County, Florida. PWC notified the Department of its activities as a transporter, small quantity generator, and transfer facility on January 8, 1992 and received EPA identification number FLD984229609.

10. Inspection History

PWC was last inspected on August 7, 2002. The facility was cited for not maintaining signed manifests for a period of three years, notification of local authorities, weekly container inspections, and not maintaining a written transfer facility log. PWC subsequently submitted records indicating the facility had come into compliance.

PWC was inspected on June 20, 1995 and was cited for failure to perform a waste determination on waste sludge generated by a Licon vacuum evaporator.

11. Process Description

Photographic Waste Control, Inc. is a hazardous waste transporter and transfer facility servicing small businesses generating waste photographic and printing chemicals. Waste chemicals are transported from the generator locations to the transfer facility where wastes are stored prior to processing in a silver recovery unit or shipment off-site for disposal.

Spent photographic fixer containing high levels of silver is consolidated into a 500-gallon above ground tank [Figure 1]. The tank is part of an electrolysis unit for recovery of the silver. Wastes containing lower levels of silver accumulate in a separate 500-gallon above ground tank [Figure 2]. This tank is connected to a series of ion exchange cartridges for recovery of the silver. Mixed wastes, including color chemistry and mixtures of photographic fixer and developer that contain silver are processed through a separate series of ion exchange cartridges [Figure 3]. Once each of the waste streams has been processed the waste is stored in 55-gallon drums. The combined waste stream from the drums is tested to ensure the silver content is below 5.0 mg/L. The waste is transferred to a tanker truck, sampled one more time for silver content, and shipped for off-site disposal.

PWC also transports small amounts of used oil, oily rags, and oily debris generated by printing presses. Non-hazardous inks are consolidated and shipped off-site to the Onyx, Pecan Road Landfill in Georgia. Mercury lamps are shipped to AERC, Melbourne, Florida, and mercury devices are shipped to Onyx, Tampa, Florida.

12. Narrative

Inspection

Silver recovery operations all take place within a curbed area inside the building. Ion exchange cartridges for recovery of low level silver waste and mixed waste are operated in series. The first cartridge removes most of the silver and the second and third cartridges remove some of the remaining silver. When the first cartridge is no longer able to effectively remove silver, the cartridge is removed and the next cartridge in line is moved forward to the first position. This allows PWC to use the cartridges more efficiently and for longer periods of time.

In the curbed area was one 55-gallon drum of ignitable waste. The drum was located approximately 25 feet from the south end of the building, which is the southern edge of the facility. Hazardous waste transfer facilities are required to comply with 40 CFR Part 265 Subpart I, including 40 CFR 265.176 which states "containers holding ignitable or reactive waste must be located at least 15 meters (50 feet) from the facility's property line."

In the second bay, developer is kept separately. This allows PWC to check the contents to look for cross contamination with petroleum products. In the back of the bay non-hazardous waste inks are stored. The inks are checked to verify they do not contain solvents prior to shipment to a non-hazardous waste landfill.

Record Review

Review of required records found PWC has scheduled employee training for October 8, 2004. The last training program was conducted on October 17, 2003. The facility contingency plan is on-site and is up to date and the closure plan is on-site.

The facility's waste tracking log has been kept for the past two years. The log tracks the generator name and address, EPA identification number, manifest number, the date the waste was received, the quantity of waste received, the date the waste was shipped from PWC, and the destination facility and manifest number.

Photographic wastes are shipped off-site to IWS, Jacksonville, Florida, Water Recovery Services, Jacksonville, Florida, and Aqua Clean, Lakeland, Florida. Oily wastes are shipped to Cliff Berry, Inc., Miami, Florida, and Perma Fix, Orlando, Florida.

13. Areas of Concern

The curbed area in the first bay, used for storage of ignitable waste, is not located at least 50 feet away from the property line on the south side of the facility – the portion of the site leased by the facility. In order to continue managing ignitable waste at the facility for periods of time greater than 24 hours, Photographic Waste Control, Inc. must provide the Department with a scale drawing of the facility documenting exactly what lies within 50 feet of the ignitable waste storage area on all four sides of the facility. Upon receipt of the

drawing, the Department will make a determination on whether or not the facility may continue to accept ignitable waste for 10-day storage.

The collection, segregation and shipping for disposal of non-hazardous wastes may require a solid waste transfer facility permit. Please contact Mr. George Cheryan, or Mr. James Bradner, with the Department's Solid Waste Program to determine if a permit is required for this activity under Chapter 62-701, Florida Administrative Code.

14. Conclusion

Photographic Waste Control, Inc. was inspected as a hazardous waste transporter and transfer facility. Photographic Waste Control, Inc. is required to submit further information to the Department before a determination can be made regarding the compliance status of the facility.

Report Prepared By: John E. White
John White
Environmental Specialist

December 15, 2004
Date

Report Reviewed By: Lu Burson
Lu Burson
Environmental Manager
December 15, 2004
Date

cc: Mike Redig, FDEP, Tallahassee, mike.redig@floridadep.net
Laurie DiGaetano, EPA Region 4, digaetano.laurie@epa.gov

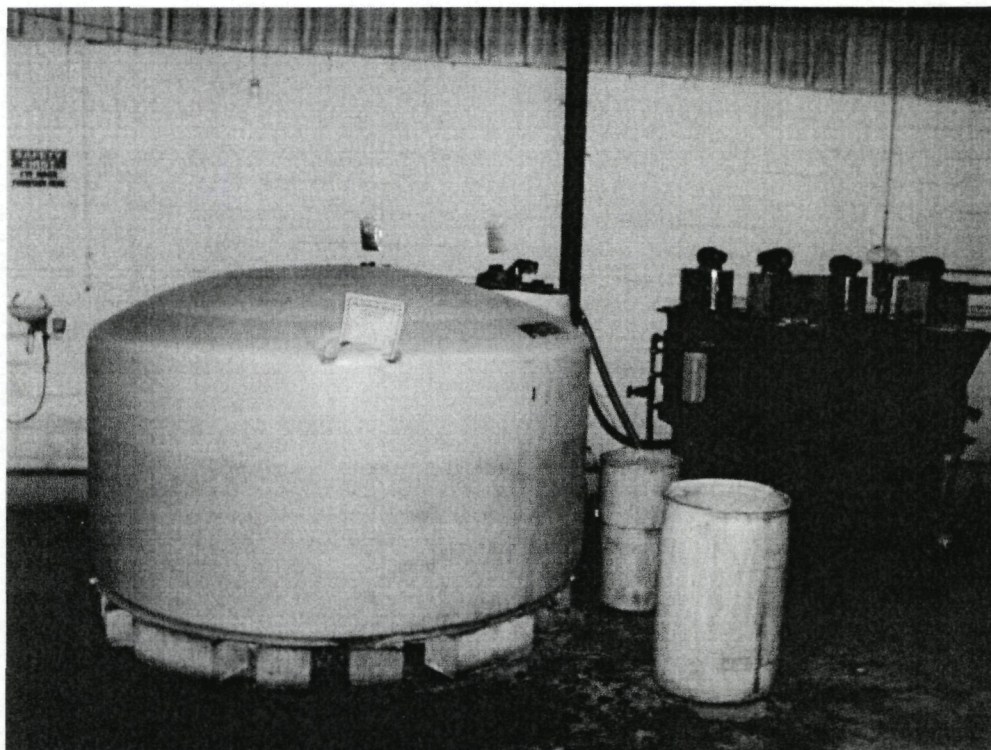


Figure 1. High level silver waste recovery system.

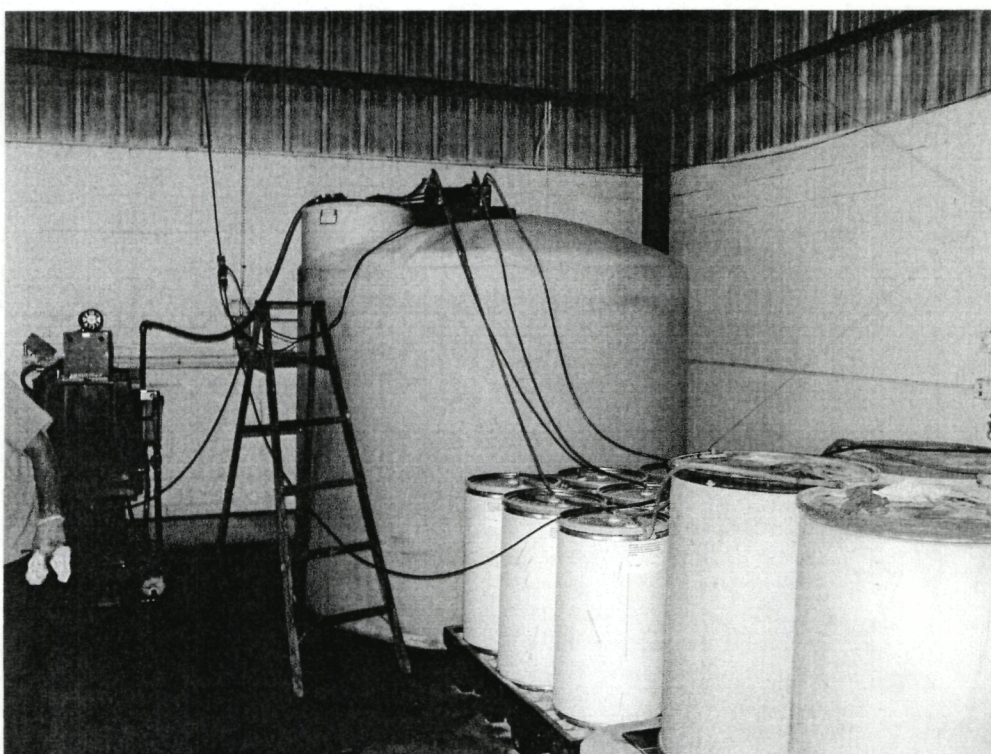


Figure 2. Low level silver waste recovery system.

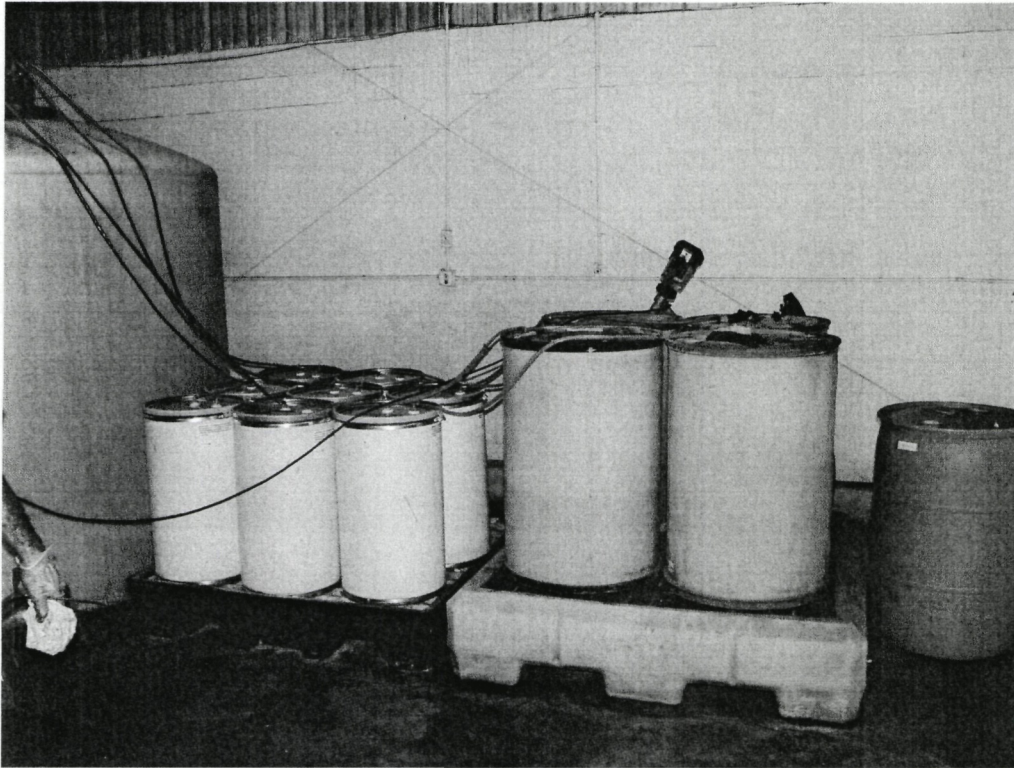


Figure 3. Mixed waste silver recovery system.



Figure 4. Ink solids destined for non-hazardous waste landfill.