Florida Department of

Environmental Protection

Hazardous Waste Inspection Report

FACILITY INFORMATION:

Facility Name: Photographic Waste Control Inc

On-Site Inspection Start Date: 01/24/2012 **On-Site Inspection End Date:** 01/24/2012

ME ID#: 48416 **EPA ID#:** FLD984229609

Facility Street Address: 1943 High St, Longwood, Florida 32750-3711

Contact Mailing Address: 1943 High St, Longwood, Florida 32750-3711

County Name: Seminole **Contact Phone:** (407) 328-9651

NOTIFIED AS:

SQG (100-1000 kg/month)
Transporter
Transfer Facility
Used Oil

INSPECTION TYPE:

Routine Inspection for Transporter facility

Routine Inspection for Transfer Facility

Routine Inspection for SQG (100-1000 kg/month) facility

Routine Inspection for Used Oil Transporter facility

Routine Inspection for Universal Waste Transporter facility

INSPECTION PARTICIPANTS:

Principal Inspector: Danielle M. Bentzen, Environmental Specialist

Other Participants: Michael Eckoff, Environmental Specialist; Bahram Ahmadi, Owner

LATITUDE / LONGITUDE: Lat 28° 43' 35.4002" / Long 81° 18' 26.5244"

SIC CODE: 4212 - Trans. & utilities - local trucking, without storage

TYPE OF OWNERSHIP: Private

Introduction:

On January 24, 2012, Danielle Bentzen and Michael Eckoff, Florida Department of Environmental Protection (DEP), inspected Photographic Waste Control, Inc (PWC) for compliance with state and federal hazardous waste regulations. Mr. Ahmadi accompanied inspectors through the facility.

PWC notified the Department of its activities as a hazardous waste transporter, small quantity generator, and transfer facility on January 8, 1992 and received EPA identification number FLD984229609.

Inspection History
On June 30, 2008, the Department inspected PWC and found the facility had failed to register as a used oil and universal waste transporter. PWC immediately registered with the Department and no enforcement action was taken.

On September 21, 2004, PWC was inspected by the Department and was in compliance at the time.

On August 7, 2002, PWC was inspected by the Department and was not in compliance at the time. The facility was cited for the following violations: failure to maintain signed manifests for three years; failure to notify local authorities; failure to document weekly container inspections; and not

maintaining a written transfer facility log. PWC subsequently submitted records indicating the facility had come into compliance and no enforcement action was taken.

Process Description:

PWC is a hazardous waste, used oil, and universal waste transporter and transfer facility servicing small businesses generating photographic, printing, and mercury wastes. 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 silver is consolidated into a 150-gallon above ground tank. The tank feeds an electrolysis unit for recovery of the silver. Treated waste water containing lower levels of silver passes from the electrolysis unit to a separate 1,000-gallon above ground tanks. This tank is connected to a series of four ion exchange cartridges for recovery of the silver. Waste passing through the cartridges is stored in 55-gallon drums. The combined waste stream from the drums is transferred to a tanker truck and shipped for off-site disposal.

PWC transports small amounts of used oil, oily rags, and oily debris generated by printing presses. Aquaclean disposes of the waste water. Non-hazardous inks are consolidated and shipped off-site. Mercury lamps are shipped to Lighting Resources, and hazardous waste chemicals are shipped to EQ of Florida, Giant Resource Recovery, or Perma-Fix.

Inspection
Silver recovery operations all take place within a curbed area inside the building. Ion exchange cartridges for recovery of silver are operated in series. The first cartridge removes most of the silver and the second and third cartridges remove the remaining silver. When the first filter 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. Sampling of waste water generated by cartridges over several years has provided the facility with guidelines on how long cartridges will last.

At the time of the inspection, there were twenty-nine 5-gallon containers, three 2.5-gallon containers, and four 1-gallon containers waiting for processing.

Ignitable wastes are stored within a delineated area in the first bay. The lines on the floor are markings to ensure the ignitable wastes are stored at least 50 feet from the property line. At the time of the inspection, there were four 5-gallon containers of waste xylene, one 55-gallon drum of paint waste, one 55-gallon drum of waste aerosol cans, and several small containers of various wastes. All containers were properly labeled and dated.

Records Review
Hazardous waste manifests and shipping papers for photographic waste, hazardous waste, and universal waste were reviewed.

Training records, contingency plan, and weekly inspections were all in compliance.

Inspectors noted the Lighting Resources manifests had an incorrect EPA identification number for Lighting Resources. PWC needs to review these manifests and make the proper corrections.

Inspectors requested information concerning non-hazardous photographic waste transported from International Minute Press. According to research conducted by FDEP, the direct to plate process used by International Minute Press, may cause the waste to contain silver. Prior to transporting any additional direct to plate photographic waste as non-hazardous waste, PWC needs to obtain analytical results from their customers to ensure the non-hazardous waste characterization.

Summary of Potential Violations and Areas of Concern:

Potential Violations

No Violations

Areas of Concern

No Areas of Concern

Conclusion:

Photographic Waste Control was inspected as a transporter and transfer facility and in compliance.

Signed:

A hazardous waste compliance inspection was conducted on this date, to determine your facility's compliance with applicable portions of Chapters 403 & 376, F.S., and Chapters 62-710, 62-730, 62-737, & 62 -740 Florida Administrative Code (F.A.C.). Portions of the United States Environmental Protection Agency's Title 40 Code of Federal Regulations (C.F.R.) 260 - 279 have been adopted by reference in the state rules under Chapters 62-730 and 62-710, F.A.C. The above noted potential items of non-compliance were identified by the inspector(s).

This is not a formal enforcement action and may not be a complete listing of all items of non-compliance discovered during the inspection.

Danielle M. Bentzen	Environmental Specialist
PRINCIPAL INSPECTOR NAME	**PRINCIPAL INSPECTOR TITLE**
NO SIGNATURE	FDEP
PRINCIPAL INSPECTOR SIGNATURE	**ORGANIZATION**

Michael Eckoff	Environmental Specialist
INSPECTOR NAME	**INSPECTOR TITLE**
NO SIGNATURE	FDEP
INSPECTOR SIGNATURE	**ORGANIZATION**

Bahram Ahmadi	Owner
REPRESENTATIVE NAME	**REPRESENTATIVE TITLE**
NO SIGNATURE	PWC
REPRESENTATIVE SIGNATURE	**ORGANIZATION**

NOTE: By signing this document, the Site Representative only acknowledges receipt of this Inspection Report and is not admitting to the accuracy of any of the items identified by the Department as "Potential Violations" or areas of concern.