Florida Department of

Environmental Protection

Hazardous Waste Inspection Report

FACILITY INFORMATION:

Facility Name: Photographic Waste Control Inc

On-Site Inspection Start Date: 09/24/2014 **On-Site Inspection End Date:** 09/24/2014

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 Transfer Facility

INSPECTION PARTICIPANTS:

Principal Inspector: John E. White, Inspector

Other Participants: Michael Eckoff, Environmental Specialist; Bob 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 September 24, 2014, John White and Michael Eckoff, Florida Department of Environmental Protection (FDEP), inspected Photographic Waste Control, Inc (PWC) for compliance with state and federal hazardous waste regulations. PWC, located at 1943 High Street, Longwood, Florida, was represented by Mr. Bahram Ahmadi, President.

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. The facility most recently provided proof of insurance meeting the hazardous waste transporter and used oil transporter requirements of 62-730.170(2)(a), F.A.C. and 62-710.600(2)(e), F.A.C. on September 8, 2014.

INSPECTION HISTORY:

On January 24, 2012, the FDEP inspected PWC and found no violations.

On June 30, 2008, the FDEP 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 formal enforcement action was taken.

On September 21, 2004, the FDEP inspected PWC and found no violations.

On August 7, 2002, PWC was inspected by FDEP 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 formal 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.

PWC transports small amounts of used oil, oily rags, and oily debris generated by printing presses. Aqua Clean 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.

Spent photographic fixer containing silver is consolidated into a 150-gallon above ground tank. The tank feeds an electrolytic treatment unit for recovery of the silver. Treated waste water containing lower levels of silver passes from the electrolytic unit to a separate 1,000-gallon above ground tank. 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.

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. The primary filter was dated 10-4-2013 and the secondary filter was dated 4-4-2014.

Located within the first bay of the warehouse, where the silver recovery unit is located, was a group of twenty-one 5-gallon containers of fixer and a second group of eleven 2.5 gallon-containers of fixer, one 5-gallon container and one 15-gallon container or fixer. The fixer contains silver and the waste was awaiting processing in the treatment system.

PWC consolidates universal waste lamps received from generators. Consolidation helps reduce breakage. The date the universal waste was received is tracked using the facility's 10-day transfer facility log. This log tracks when waste enters and leaves the facility. There were thirteen boxes of 8-foot lamps, four boxes of 4-foot lamps, one cylindrical container of 4-foot lamps, and one cylindrical container of 2-foot lamps.

Four 55-gallon drums of latex paint, two 55-gallon drums of water based glues, and three 55-gallon drums of water based (non-hazardous) inks were also stored in this area of the warehouse.

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. Within the area were two 55-gallon drums and one 5-gallon container of ignitable wastes and one 55-gallon drum of aerosol cans. No issues were found with this area.

In the second bay, spent photographic developer is pumped into two 300-gallon tanks. When full, the contents of the tanks are shipped to Aqua Clean, located in Lakeland, Florida.

Also located in the second bay was a 275-gallon tote containing industrial wastewater generated by the Florida prison system's Bushnell Prison. The prison is on a septic system and cannot discharge the wastewater.

Empty photographic developer containers are rinsed with water and the wastewater accumulates in the photographic developer wastewater containers. Empty photographic fixer containers are rinsed

with water and the wastewater is processed in the silver recovery system.

A small table is used for consolidation of lab packs. Two 5-gallon buckets of waste were being consolidated at the time of inspection.

RECORD REVIEW:

A review of hazardous waste manifests found hazardous wastes are transported to PermaFix of Florida, EPA identification number FLD980711071, located in Gainesville, Florida.

Non-hazardous waste is shipped to Giant Resource Recovery-Sumter, located in Sumter, South Carolina. These wastes include latex paints and water based inks.

Used oil is shipped to Oils Unlimited, located in Sanford, Florida.

Wastewaters are shipped to Aqua Clean, located in Lakeland, Florida.

Universal Waste is shipped to Lighting Resources, Ocala, Florida.

The transfer facility 10-Day log includes the generator name, EPA identification number, manifest number, date received, quantity received and waste codes, shipment date, and destination facility. The facility was asked to refrain from the use of white-out on the log. Any changes should be struck-through and initialed.

The Contingency Plan was last updated February 3, 2014. Mr. Ahmadi is the emergency coordinator. Notifications of local authorities have been made and the green cards, certified return receipts, are kept on file.

The Transfer Facility closure plan is maintained on site.

Annual training was last completed on August 9, 2013.

Conclusion:

Photographic Waste Control was inspected as a hazardous waste transporter and transfer facility and used oil transporter and no violations were cited. The facility was asked to ensure boxes containing universal waste lamps for recycling are kept properly labeled when conducting consolidation operations and to test the waste in the empty drum rinsate waste accumulation drum.

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.

John E. White	Inspector
PRINCIPAL INSPECTOR NAME	**PRINCIPAL INSPECTOR TITLE**
	FDEP
	ORGANIZATION

Supervisor: **Aaron Watkins**

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.