



**Florida Department of
Environmental Protection
Hazardous Waste Inspection Report**

FACILITY INFORMATION:

Facility Name: Photographic Waste Control Inc

On-Site Inspection Start Date: 05/10/2016

On-Site Inspection End Date: 05/10/2016

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

INSPECTION PARTICIPANTS:

Principal Inspector: John E. White, Inspector

Other Participants: Jeff Waters, ECAP3 Manager; Edgardo Bautista, Inspector; 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 May 10, 2016, John White, Florida Department of Environmental Protection (Department), and Jeff Waters and Edgardo Bautista, Seminole County ECAP3, inspected Photographic Waste Control (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 March 24, 2016.

The facility operates in Central and Southeast Florida running one truck with one driver. The facility has a total of three employees. Normal business hours are 8:00 AM to 5:00 PM Monday through Friday.

INSPECTION HISTORY (Last 10 Years):

On September 24, 2014, the Department inspected PWC and no violations were cited.

On January 24, 2012, the Department inspected PWC and no violations were cited.

On June 30, 2008, the Department inspected PWC and found the facility, a registered hazardous

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waste transporter, had failed to also register as a used oil and universal waste transporter. PWC immediately registered with the Department 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 operates from two bays. The southern-most bay contains the offices, the silver recovery system, and the main transfer waste storage area. The second bay is used for storage of processed silver fixer, photographic developer, and empty containers.

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 Perma-Fix, located in Gainesville, Florida.

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 275-gallon tote. The tote is connected to a series of two 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 tote 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 cartridge removes the remaining silver. When the first filter is no longer able to effectively remove silver, the cartridge is removed and the second cartridge 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 03-27-2015 and the secondary filter was dated 01-29-2016.

Located adjacent to the silver recovery system were eighteen 5-gallon and three 15-gallon containers of silver fixer waiting to be processed.

Inside the main bay is an area of the floor outlined in yellow. This "yellow" area is used for storage of flammable wastes as this is the only area of the facility that meets the 50-foot setback requirement of 40 CFR 265.176. Located in the area was one 55-gallon drum of Waste Xylene Solution, one 55-gallon drum of Waste Aerosols, one 55-gallon drum of Waste Petroleum Naphtha consolidated from CESQG's, two 5-gallon containers of Waste Naphtha, eight 1-gallon containers of Waste Paints, and one 1-quart container of a Waste Flammable.

Because PWC was consolidating wastes from CESQG's and storing the waste for up to one month, the facility was required to request authorization to manage CESQG waste from the State in accordance with the requirements of 62-730.220(5), F.A.C. On May 25, 2016, PWC submitted a request to manage CESQG waste that met the requirements of 62-730.220(5), F.A.C. The Division of Waste Management in Tallahassee will review the request and, if approved, provide a written authorization to PWC allowing management of CESQG waste for up to 180 days from receipt of the waste.

Located adjacent to the flammable storage area were three 55-gallon drums of non-hazardous latex paint being consolidated for disposal, three 30-gallon fiber drums of X-ray film, one 55-gallon drum of used oil that was properly labeled and managed, and three 55-gallon drums of non-hazardous waste water.

The facility also had one 15-gallon and one 30-gallon container of biomedical waste.

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Located in the second bay was one 275-gallon tank that contained about 165 gallons of non-hazardous photographic developer waste. Four empty 275-gallon totes and several empty 5-gallon containers were also stored in this area.

RECORDS REVIEW:

The Department's telephone number on the contingency plan required updating. This was done during the inspection.

The transfer facility closure plan, required by 62-730.171(3)(a)(5), F.A.C. was on-site as required.

The silver recovery system log documented the last time the system was operated was 4-26-2016.

RCRA hazardous waste and OSHA training was last conducted 4-22-2015.

Review of the 10-day transfer facility manifest tracking log, as required by 62-730.171(6), F.A.C., found the facility exceeded the 10-day storage period for transfer facilities in apparent violation of 40 CFR 263.12. The waste in violation was from Southeastern Printing, EPA ID FLD004121646. The waste arrived on Manifest 8925443 on 4-13-2016 and was shipped off-site for disposal at Perma-Fix Gainesville on 4-23-2016.

New Potential Violations and Areas of Concern:

Violations

Type: Violation

Rule: 263.12

Explanation: Transfer facility requirements. A transporter who stores manifested shipments of hazardous waste in containers meeting the requirements of 262.30 at a transfer facility for a period of ten days or less is not subject to regulation under parts 270, 264, 265, and 268 of this chapter with respect to the storage of those wastes.

Review of the manifest tracking log found the facility exceeded the 10-day storage period for transfer facilities. Waste from Southeastern Printing, EPA ID FLD004121646, arrived on Manifest 8925443 on 4-13-2016 and was shipped off-site for disposal at Perma-Fix of Gainesville, Florida, on 4-28-2016. The waste was stored for a period of fifteen days.

Corrective Action: Photographic Waste Control shall provide written documentation that the facility has modified its operations to prevent a recurrence of this violation.

In a email received 6/4/2016, Bob Ahmadi, President of Photographic Waste Control, provided a written statement that the facility will comply with the 10-day transfer facility requirements.

Conclusion:

Photographic Waste Control was inspected as a hazardous waste and used oil transporter and was not in compliance at the time of this inspection. Based on a written submittal, received June 4, 2016, the facility has returned to compliance and no further action is required.

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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

PRINCIPAL INSPECTOR NAME

Inspector

PRINCIPAL INSPECTOR TITLE

FDEP

ORGANIZATION**Supervisor:**Christine Daniel

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.