



# Florida Department of Environmental Protection

Bob Martinez Center  
2600 Blair Stone Road  
Tallahassee, Florida 32399-2400

Rick Scott  
Governor

Carlos Lopez-Cantera  
Lt. Governor

Jonathan P. Steverson  
Secretary

June 8, 2016

Bob Ahmadi  
1943 High Street  
Longwood FL 32750

Re: **CESQG Hazardous Waste Management Plan**  
**Photographic Waste Control, Inc.**  
**1943 High Street**  
**Longwood FL 32750**

Dear Mr. Ahmadi,

On May 25, 2016, the Florida Department of Environmental Protection (DEP) received your letter requesting formal authorization for your facility, Photographic Waste Control (PWC), located at 1943 High Street, Longwood, Florida, to manage hazardous waste from Conditionally Exempt Small Quantity Generators (CESQGs) pursuant to Rule 62-730.220(5), F.A.C.

DEP hereby approves your request with the understanding that your facility has specific standard operating procedures for accepting business waste approved by the Department including location, generator responsibilities, amount and type of wastes, time limits, and recordkeeping, as appropriate to the request and the generator status of the authorized person. In particular, the Department expects your facility will observe the following management practices:

At generator facility and arrival at PWC's Site:

- Comply with all USDOT shipping requirements when preparing waste for shipment off-site.
- Ensure the generator is a CESQG and have the facility certify in writing that they are operating as a CESQG. Keep these certifications on-site for at least three years.
- Load and store drums such that incompatible wastes are separated.
- Upon arrival at Photographic Waste Control, drums will be brought inside the facility within one business day.
- Consolidation will start within two business days once brought inside the facility.

After consolidation:

- Maintain adequate aisle space in accordance with 40 CFR 265.35.
- Inspect drums weekly and maintain an inspection log in compliance with 40 CFR 265.174 and 62-730.160(5), FAC.
- Unless actively being consolidated, all hazardous waste containers shall be kept closed and sealed in accordance with 40 CFR 265.173.

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- Label all hazardous waste containers with the words "hazardous waste," and once consolidated, date with the accumulation start date.
- Do not store consolidated CESQG hazardous waste more than 180 days.
- Fire, spill, and decontamination equipment should be readily available and in working condition in accordance with 40 CFR 265.32.
- Ensure all containers are kept in good condition in accordance with 40 CFR 265.171.
- All employees handling hazardous waste will receive training in hazardous waste procedures.
- Hazardous waste transporter registration shall be kept current. Keep registration certificate in all vehicles transporting hazardous waste.
- The facility will not accumulate more than 5,000 pounds of CESQG waste on-site at any one time.
- The CESQG(s) will be provided a copy of the final manifest to document disposal.
- Store hazardous waste in a secure area.
- Keep an inventory/log of what hazardous waste is stored on-site. This log will include:
  - Manifest number for each shipment that enters and leaves the facility, or, for a shipment from a CESQG without a manifest, an identifying number from the shipping document.
  - The date when all hazardous waste enters and leaves the facility.
  - Name, address, and EPA ID number (if applicable) of the generator.
  - The amount of hazardous waste and hazardous waste codes associated with each shipment into and out of the facility.

If Photographic Waste Control, Inc. does not follow the above management practices, the DEP can revoke its authorization to consolidate CESQG waste at any time.

If we can provide you with any additional assistance, or if you have any questions, please contact John White at 407.897.4305 or [john.white@dep.state.fl.us](mailto:john.white@dep.state.fl.us)

Sincerely,



Glen Perrigan  
Environmental Manager  
Permitting and Compliance Assistance Program

cc: John White, FDEP Central District