



FLORIDA DEPARTMENT OF Environmental Protection

CENTRAL DISTRICT OFFICE
3319 MAGUIRE BLVD., SUITE 232
ORLANDO, FLORIDA 32803

Ron DeSantis
Governor

Jeanette Nuñez
Lt. Governor

Noah Valenstein
Secretary

March 18, 2019

Bahram Ahmadi, President
Photographic Waste Control, Inc.
1943 High Street
Longwood, Florida 32750
pwci@bellsouth.net

Re: Photographic Waste Control, Inc.
HW Facility ID # FLD984229609
Seminole County

Dear Mr. Ahmadi:

Department personnel conducted an inspection of the above-referenced facility on February 7, 2019. Based on the information provided during and following the inspection, the facility was determined to be in compliance with the Department's rules and regulations. A copy of the inspection report is attached for your records.

The Department appreciates your efforts to maintain this facility in compliance with state and federal rules. Should you have any questions or comments, please contact John White at 407-897-4305 or via e-mail at John.White@dep.state.fl.us.

Sincerely,

A handwritten signature in black ink, appearing to read "Enrique Acosta Gonzalez".

Enrique Acosta Gonzalez, Environmental Manager
Central District
Florida Department of Environmental Protection

Enclosure: February 7, 2019 Inspection Report



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

FACILITY INFORMATION:

Facility Name: Photographic Waste Control Inc

On-Site Inspection Start Date: 02/07/2019

On-Site Inspection End Date: 02/07/2019

ME ID#: 48416

EPA ID#: FLD984229609

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

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

County Name: Seminole

Contact Phone: (407) 328-9651

NOTIFIED AS:

SQG (100-1000 kg/month)

Transfer Facility

Transporter

Used Oil

INSPECTION TYPE:

Routine Inspection for Hazardous Waste Transporter facility

INSPECTION PARTICIPANTS:

Principal Inspector: John E. White, Inspector

Other Participants: Michael Eckoff, Inspector; Bahram Ahmadi, President

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 February 7, 2019, John White and Michael Eckoff, Florida Department of Environmental Protection, 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 the President of PWC, Mr. Bahram Ahmadi.

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 10, 2018.

The facility operates in Central and Southeast Florida with one truck and one driver. The facility has two employees and normal business hours are 8:00 AM to 5:00 PM Monday through Friday.

INSPECTION HISTORY: (Last 5 Years)

PWC was last inspected on May 10, 2016, and was not in compliance. One shipment of hazardous waste was stored on-site for a period of fifteen days in violation of the 10-day limit for transfer facilities. The case was closed without formal enforcement.

PWC was inspected on September 24, 2014, and no violations were cited.

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

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or consolidated for shipment off-site every 10-days for disposal.

PWC previously operated from two bays but the operation has consolidated into one bay. The facility consists of offices and a warehouse area containing the silver recovery system and a waste transfer area.

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 directly into an electrolytic treatment unit for recovery of the silver (Figure 1). Treated waste water containing lower levels of silver passes from the electrolytic unit to a 55-gallon drum. The drum is connected to a series of two ion exchange cartridges operated in series for recovery of silver. 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. Waste passing through the cartridges is stored in a 55-gallon drum. The combined waste stream from the drums is transferred to a tote and shipped for off-site disposal. The silver recovery unit only operates every couple of months due to the reduction in the number of companies using photographic fixer. Most x-ray equipment is now digital.

Solids settling in the silver recovery filters are dried in a shallow, metal pan (Figure 2) before being accumulated in a container and shipped off-site for silver recovery at Hallmark Refining Corporation, Mt. Vernon, Washington.

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 Flammable Liquid."

Adjacent to the flammables storage area were five 55-gallon drums of waste latex paint. These wastes will be shipped to a subtitle D landfill in Sumter, South Carolina.

Drums of oils and wastewaters are transported from generator locations that are on septic systems. These wastes are shipped off-site to Aqua Clean.

Universal waste-lamps were stored in boxes against an outer wall. The boxes were properly labeled and closed.

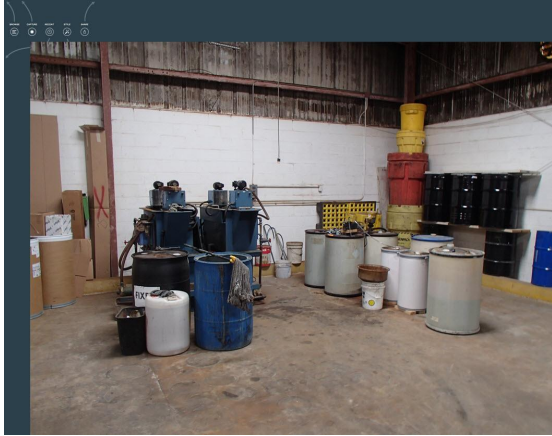
The facility continues to maintain a closure plan, required by rule 62-730.171(3)(a)(5), F.A.C., and a contingency plan.

Facility personnel last received training on November 14, 2018.

PHOTO ATTACHMENTS:

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1. Silver Recovery System



2. Silver Sludge Drying Pan



Conclusion:

Photographic Waste Control was inspected as a hazardous waste, used oil, and universal waste transporter and transfer facility and was in compliance at the time of this inspection.

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1.0 - Pre-Inspection Checklist

Requirements:

The requirements listed in this section provide an opportunity for the Department's inspector to indicate the conditions found at the time of the inspection. A "Not Ok" response to a requirement indicates either a potential violation of the corresponding rule or an area of concern that requires more attention. Both potential violations and areas of concern are discussed further at the end of this inspection report.

Note: Checklist items with shaded boxes are for informational purposes only.

Item No.	Pre-Inspection Review	Yes	No	N/A
1.1	Has the facility notified with correct status? 262.18(a)	✓		
1.2	Has the facility notified of change of status? 62-730.150(2)(b)			✓
1.3	Did the facility conduct a waste determination on all wastes generated? 262.11	✓		

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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.

John E. White

Principal Inspector Name

Inspector

Principal Inspector Title

JW

Principal Inspector Signature

DEP

Organization

02/18/2019

Date

Michael Eckoff

Inspector Name

Inspector

Inspector Title

FDEP

Organization

Bahram Ahmadi

Representative Name

President

Representative Title

Photographic Waste Control, Inc.

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.

Report Approvers:**Approver:**

Enrique AcostaGonzalez

Inspection Approval Date:

02/18/2019