



Jeb Bush
Governor

Department of Environmental Protection

Central District
3319 Maguire Boulevard, Suite 232
Orlando, Florida 32803-3767

David B. Struhs
Secretary

January 22, 2003

CERTIFIED MAIL

7001 2510 0002 4340 9527

Mr. Bob Ahmadi
Photographic Waste Control
1943 High Street
Longwood, Florida 32750

OCD-HW-C-03-0026

Seminole County - HW
Photographic Waste Control

Dear Mr. Ahmadi:

A hazardous waste compliance inspection was conducted at your facility on August 7, 2002. This inspection was conducted under the authority of Section 403.091, Florida Statutes, and Chapter 403, Part IV, Florida Statutes. The inspection is designed to ascertain the compliance status of your facility with 40 CFR 260-268, adopted in Florida Administrative Code Chapter 62-730. The attached RCRA Compliance Inspection Report, indicates that at this time the hazardous waste classification of your facility is a hazardous waste transporter, transfer facility, and small quantity generator and is in compliance.

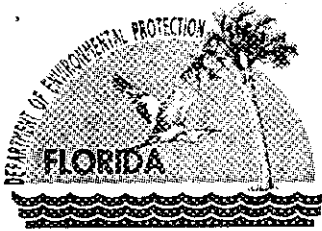
If you have any questions, please contact me, at (407) 893-3323.

Sincerely,

William Kappler
Environmental Specialist
Hazardous Waste

WK

Enclosure: RCRA Inspection Report



Department of Environmental Protection

Jeb Bush
Governor

Central District
3319 Maguire Boulevard, Suite 232
Orlando, Florida 32803-3767

David B. Struhs
Secretary

HAZARDOUS WASTE INSPECTION REPORT

1. INSPECTION TYPE: Routine Complaint Follow-Up Permitting Pre-Arranged

FACILITY NAME Photographic Waste Control EPA ID # FLD984229609

STREET ADDRESS 1943 High Street, Longwood, Florida 32750

MAILING ADDRESS 1943 High Street, Longwood, Florida 32750

COUNTY Seminole PHONE (407) 328-9651 DATE 8/7/02 TIME 10:11am

NOTIFIED AS: N/A

- Non Handler
- CESQG (<100 kg/mo.)
- SQG (100-1000 kg/mo.)
- Generator (>1000 kg/mo.)
- Transporter
- Transfer Facility
- Interim Status TSD Facility
- TSD Facility
- Unit Type(s):
- Exempt Treatment Facility
- Used Oil:

CURRENT STATUS:

- Non Handler
- CESQG (<100 kg/mo.)
- SQG (100-1000 kg/mo.)
- Generator (>1000 kg/mo.)
- Transporter
- Transfer Facility
- Interim Status TSD Facility
- TSD Facility
- Unit Type(s):
- Exempt Treatment Facility
- Used Oil:

2. APPLICABLE REGULATIONS:

- | | | | |
|--|--|--|---|
| <input type="checkbox"/> 40 CFR 261.5 | <input checked="" type="checkbox"/> 40 CFR 262 | <input type="checkbox"/> 40 CFR 263 | <input type="checkbox"/> 40 CFR 264 |
| <input checked="" type="checkbox"/> 40 CFR 265 | <input type="checkbox"/> 40 CFR 266 | <input checked="" type="checkbox"/> 40 CFR 268 | <input type="checkbox"/> 40 CFR 273 |
| <input checked="" type="checkbox"/> 40 CFR 279 | <input type="checkbox"/> 62-710, FAC | <input type="checkbox"/> 62-737, FAC | <input checked="" type="checkbox"/> 62-730, FAC |

3. RESPONSIBLE OFFICIAL(s):

Bob Ahmadi, CEO

4. INSPECTION PARTICIPANTS:

William Kappler, FDEP	Barbara Simboli, Photographic Waste
Nancy McKee, FDEP	Bob Ahmadi, Photographic Waste
Danielle Spear, Seminole County	

5. LATITUDE/LONGITUDE:

6. SIC Code: 7384

7. TYPE OF OWNERSHIP: Private Federal State County Municipal

8. PERMIT #: N/A ISSUE DATE: EXP. DATE:

"More Protection, Less Process"

Printed on recycled paper.

9. INTRODUCTION

On August 7, 2002, William Kappler and Nancy McKee (inspectors) of the Florida Department of Environmental Protection (FDEP) and Danielle Spear of Seminole County inspected Photographic Waste Control (PWC) for compliance with hazardous waste rules and regulations. Bob Ahmadi and Barbara Simboli accompanied inspectors.

The facility is located at 1943 High Street, Longwood, Seminole County, Florida. PWC employs 4 people. Sanitary sewer and potable water services is provided by the City of Longwood. PWC notified as a small quantity generator, transporter, and transfer facility on January 8, 1992.

10. INSPECTION HISTORY

PWC was last inspected on June 20, 1995. The facility was cited for not performing a waste determination on waste sludge and liquid generated by the Licon, 40 CFR 262.11.

Additionally the Department recommended that the facility maintain a written record on all hazardous waste entering and leaving the facility, 62-730.171(2)(e).

11. PROCESS DESCRIPTION

Photographic Waste Control is a hazardous waste transporter and transfer facility which services small businesses generating waste photographic chemicals and related materials.

Waste photographic fixer, developer, toner, spent photo-processing chemicals, and waste inks are transported from generator locations to the transfer facility, which also houses the silver recovery operation.

Spent photographic fixer containers are emptied into one 500-gallon above ground tank and photographic developer into a second 500-gallon above ground tank. The spent fixer, which contains silver, is processed through Mark 26 recovery columns to remove the silver. The processed fixer waste then accumulates in a 500-gallon holding tank. The processed fixer is laboratory tested one time per month. Generally the test results show a silver concentration of 1 to 3 mg/L.

PWC no longer uses the Licon vacuum evaporator. Use of the vacuum evaporator was discontinued in March 1997.

12. INSPECTION

Inspection of the spent photographic waste area found numerous containers accumulating prior to treatment. Inspectors observed 19 55-gallon drums of spent fixer, 28 five-gallon containers of spent fixer, three 10-gallon containers of spent fixer, and one 20-gallon container of spent fixer. The containers are labeled as hazardous waste, marked with the name of the facility generating the waste, and with the D011 waste code. Inspectors also observed three 5-gallon containers of spent developer possibly contaminated with fixer. PWC is waiting for the laboratory report on samples obtained from the containers.

Inspection of the hazardous waste drum area found one 55-gallon drum of waste corrosive liquid (D002), three 55-gallon drums of waste flammable liquid (D001), one 55-gallon drum of nonhazardous waste ink, and one 55-gallon drum of nonhazardous waste U.V. coating solution.

Photographic Waste Control
Page 3

The drums are labeled as hazardous waste, closed, and marked with the dates in July or August 2002.

Inspectors observed containers of used oil not marked or labeled as used oil, **40 CFR 279.22(c)(1)**. Containers used to store used oil at generator facilities must be labeled or marked clearly as used oil. Label or mark all containers of used oil with the words "used oil".

Inspectors also observed nine 55-gallon drum of treated fixer and spent developer accumulating prior to off-site shipment.

Waste Management

PWC manages waste fixer and waste developer in containers for processing in its filtration system for silver reclamation.

PCW transports wastewater generated from silver reclamation operations and spent developer to IWS (FLD984229609) located in Jacksonville, Florida. The wastewater and developer is transported in a 4800-gallon tanker.

Petrotech Southeast (FLD982108136) transports used oil and oily water for reclamation.

Mercury lamps and alkaline batteries are shipped to AERC (FLD984262782) located in Melbourne, Florida.

Hazardous waste is transported by PWC to Perma-Fix (FLD980711071) located in Gainesville, Florida.

PWC also uses Freehold Cartage, Inc (NJ054126164) to transport hazardous waste.

Record Review

Manifests

Inspectors reviewed 12 manifests from March 2001 to August 2002.

PWC did not keep a copy of each manifest signed in accordance with 40 CFR 262.23(a) for three years or until the facility received a signed copy from the designated facility which received the waste. PWC did not retain several signed manifests from the TSDf that accepted the waste, 40 CFR 262.40(a).

Waste Analysis

Inspectors reviewed the most recent waste analysis report dated July 26, 2002 for fixer wastewater. The laboratory report results showed a total silver concentration of 2380 ug/L and 1380 ug/L on wastewater shipped to IWS.

Contingency Plan

PWC has a Contingency Plan and updated the plan during the first quarter of 2001. Mr. Bob

Ahmadi is the primary emergency coordinator. PWC personnel explained to inspectors that the Contingency Plan was hand delivered to the local authorities.

Arrangements with Local Authorities

PWC's contingency plan described the arrangements with local authorities, however the arrangements were not documented, 40 CFR 265.37.

Weekly Written Inspection Logs

PWC visually inspects drums of hazardous waste daily. The inspections are not documented, 62-730.160(6), FAC.

Personnel Training Records

PWC personnel are given a 40 hour course in Hazardous Waste Operations and Emergency Response (29 CFR 1910.120). The course is presented by Perma-Fix of Florida.

Bob Ahmadi, Barbara Simboli, Robert Santiago, Scott Johnson, and John Nicolosi were trained on October 12, 2001. Additional training certificates were reviewed for personnel training in 2000 and 1999.

Closure Plan

PWC has a written closure plan to close the transfer facility. The plan appeared satisfactory.

Transfer Facility Written Record

PWC did not maintain a written record of when all hazardous waste enters and leaves the facility, 62-730.171(2)(e), FAC.

Review of the PWC's transporter insurance and transfer facility notification paperwork found no violations.

Land Ban

PWC generates corrosive and toxic characteristic hazardous waste and listed hazardous waste that are restricted from land disposal.

13. SUMMARY OF POTENTIAL NONCOMPLIANCE ITEM & CORRECTIVE ACTION

a. Regulation: 40 CFR 262.40(a) - Manifest

A generator must keep a copy of each manifest signed in accordance with 40 CFR 262.23(a) for three years or until he receives a signed copy from the designated facility which received the waste. This signed copy must be retained as a record for at least three years from the date the waste was accepted by the initial transporter. PWC did not obtain several signed manifests from the TSDf that accepted the waste.

Corrective Action: Contact the TSDf and obtain the signed manifests.

b. Regulation: 40 CFR 265.37 - Preparedness and Prevention

The generator must attempt to make arrangements to familiarize police, fire departments, hospitals, and emergency response teams with characteristics of the facility. PWC did not document the arrangements made with the local authorities.

Corrective Action: PWC submitted written information dated August 16 and 22, 2002 they made arrangements with the local authorities.

c. Regulation: 62.730.160(6), FAC - Weekly Inspections

Generators of hazardous waste who accumulate hazardous waste on-site under 40 CFR 262.34, shall maintain written documentation of the inspections required under 40 CFR Part 265.

Corrective Action: PWC submitted written information dated August 16, 2002 they are documenting inspections.

d. Regulation: 62.730.171(2)(e), FAC - Transfer Facility Written Record

The owner/operator of a transfer facility shall maintain a written record of when all hazardous waste enters and leaves the facility.

Corrective Action: PWC submitted written information dated August 7 and 8, 2002 they have established and are maintaining a written record.

Recommendation

1. Drums picked up from CESQG's should have the name and other identifying information of the generator on the drum label. This will allow the facility to identify the generator if a problem should be found with a container or the waste.

14. CONCLUSION

PWC was inspected as a small quantity generator of hazardous waste, transporter, and transfer facility and was not in compliance at the time of the inspection. Corrective action documentation submitted subsequent to the inspection is satisfactory and is in compliance.

Report Prepared By:


William Kappler
Environmental Specialist

Date: 1/22/03

WK

SENDER: COMPLETE THIS SECTION

COMPLETE THIS SECTION ON DELIVERY

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

A. Received by (Please Print Clearly) B. Date of Delivery
 1-24-03

C. Signature
 X *Bob Baker* Agent Addressee

D. Is delivery address different from item 1? Yes No
 If YES, enter delivery address below: *00D-HW-03-0026*

1. Article Addressed to:
Bob Almadi
Photographic Waste Control
1943 Hight St
Longwood FL 32750

3. Service Type
 Certified Mail Express Mail
 Registered Return Receipt for Merchandise
 Insured Mail C.O.D.

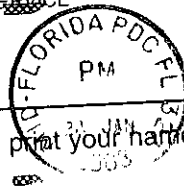
4. Restricted Delivery? (Extra Fee) Yes

2. Article Number: *7001 2510 0002 4340 9527*

PS Form 3811, July 1999 Domestic Return Receipt

102595-00-M-0952
 HAZARDOUS WASTE

UNITED STATES POSTAL SERVICE

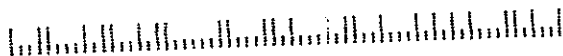


First-Class Mail
Postage & Fees Paid
USPS
Permit No. G-18

• Sender. Please print your name, address, and ZIP+4 in this box •

Florida Department of Environmental Protection
Central District Office
3319 Maguire Boulevard, Suite 232
Orlando, FL 32803-3767
(407) 894-7555

RECEIVED
JAN 21 2003
CENTRAL DIST. - DEP



Mr William Kappeler

Fax — 407 893 3167

To

From

Barbara

Photographic
WASTE CONTROL

Phone 407-328-9651

Fx 407 328 7158

<p>Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.</p> <p>Print your name and address on the reverse so that we can return the card to you.</p> <p>Attach this card to the back of the envelope, or on the front if space permits.</p>	<p>A. Received by (Please Print Clearly) <i>KD STACY</i></p>	<p>B. Date of Delivery <i>8-21-02</i></p>	
	<p>C. Signature <i>KD Stacy</i></p> <p><input type="checkbox"/> Agent <input type="checkbox"/> Addressee</p>	<p>D. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No</p>	
<p>1. Article Addressed to: <i>Seminole Co. Sheriff's District Center office 100 Busch Blvd Sanford, FL 32773</i></p>	<p>3. Service Type</p> <p><input type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.</p>		
<p>2. Article Number (Copy to)</p>	<p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p> <p>7002 0510 0004 4832 4347</p>		



PHOTOGRAPHIC WASTE
CONTROL, INC.
1943 HIGH STREET
LONGWOOD FL 32750
FAX 407-328-7138
PHONE 888-582-4833

facsimile transmittal

TO ATTENTION: WILLIAM KAPPLER 407-893-3167

FR BARBARA DATE: AUGUST, 2002

RE PAGES 13 includes cover page

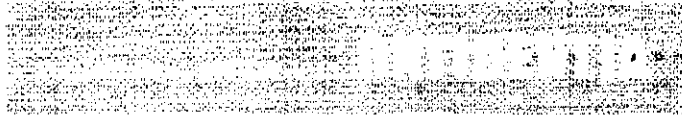
MR. KAPPLER,

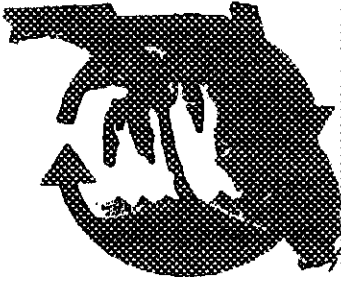
HERE ARE THE PAPERS YOU REQUIRE. (TRAINING CERTIFICATES FOR 1999 & 200, DRUM INSPECTION LOG, AND SIGNED RECEIPTS FOR CONTINGENCY PLAN)
TALLAHASSEE DID NOT WANT A COPY OF OUR CLOSURE PLAN (MR. RICHARD NEVES)—"THEY WOULDN'T KNOW WHAT TO DO WITH IT", THAT'S WHAT HE TOLD ME. HE SAID HE WOULD CALL YOU.
IS THIS EVERYTHING YOU NEED? CALL ME IF THERE ARE ANY PROBLEMS OR CONCERNS. (407-328-9651)

THANK YOU,

BARBARA

Barbara Simboli





Photographic Waste Control, Inc.

Protecting You and the Environment

PHOTOGRAPHIC WASTE CONTROL, INC.
1943 HIGH STREET
LONGWOOD, FL 32750

CONTINGENCY PLAN SUBMITTAL

I CERTIFY THAT ON THIS 12 DAY OF Aug, 2002
RECEIVED A COPY OF THE CONTINGENCY PLAN FOR PHOTOGRAPHIC
WASTE CONTROL, INC. LOCATED AT 1943 HIGH STREET, LONGWOOD,
FLORIDA 32750.

FURTHER, THIS ORGANIZATION AGREES TO RESPOND TO, OR ASSIST IN,
EMERGENCY SITUATIONS WHICH MAY ARISE AT THE SUBJECT FACILITY
SHOULD THE NEED ARISE.

SIGNATURE: [Signature]

PRINTED NAME: JOHN T HAUSERMAN

TITLE: S/W

ORGANIZATION: Sevier County Solid Waste

CHECK THIS BOX, IF THE ORGANIZATION WILL ACKNOWLEDGE RECEIPT
OF THE CONTINGENCY PLAN, BUT WILL NOT AGREE TO PROVIDE
EMERGENCY RESPONSE SERVICES TO THE FACILITY. P.N. 8/13/2002

[Signature]

NOTE: CONTINGENCY PLAN SUBMITTALS AND COORDINATION AGREEMENTS ARE REQUIRED IN ORDER TO
DOCUMENT PHOTOGRAPHIC WASTE CONTROL, INC.'S COMPLIANCE WITH 40 CFR 264.37. WHERE STATE OR
LOCAL AUTHORITIES OR ORGANIZATIONS DECLINE TO ENTER INTO EMERGENCY RESPONSE AGREEMENTS OR
ARRANGEMENTS, THE FACILITY OWNER MUST DOCUMENT THE REFUSAL WITHIN THE FACILITY'S OPERATING
RECORD

Contingency Plan
Sent to these

Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
 Print your name and address on the reverse so that we can return the card to you.
 Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:
 DONNA Halton
 Florida Hospital
 601 E. Altamonte Drive
 Altamonte Springs FL
 32714

2. Article Number
 (Transfer from service label) 7002 0510 0003 2874 4203

PS Form 3811, August 2001 Domestic Return Receipt 102555-00-41-1540

A. Signature Agent
 Addressee
 B. Received by (Printed Name) STEVE GATNER
 C. Date of Delivery 8/15/02
 D. Is delivery address different from item 1? Yes
 If YES, enter delivery address below: No

3. Service Type
 Certified Mail Express Mail
 Registered Return Receipt for Merchandise
 Insured Mail C.O.D.

4. Restricted Delivery? (Extra Fee) Yes

Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
 Print your name and address on the reverse so that we can return the card to you.
 Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:
 Maledon Trib
 Seminole Co. Public Safety
 spec. operation
 110 Busch Blvd
 Sanford, FL 32773

2. Article Number
 (Transfer from service label) 7002 0510 0003 2874 4210

PS Form 3811, August 2001 Domestic Return Receipt 102555-00-41-1540

A. Signature Agent
 Addressee
 B. Received by (Printed Name) M. DOURCAS
 C. Date of Delivery 8/15/02
 D. Is delivery address different from item 1? Yes
 If YES, enter delivery address below: No

3. Service Type
 Certified Mail Express Mail
 Registered Return Receipt for Merchandise
 Insured Mail C.O.D.

4. Restricted Delivery? (Extra Fee) Yes

WEEKLY INSPECTION LOG

Inspector: Robert Santiago
Clearly Print Name

Date: 8/10/02

Time: 6:00pm

Accumulation Area Inspected: YES

Number of Containers: 1

Are all containers in good condition?

Yes U

No

Is there any evidence of leaks or spills?

Yes

No ✓

Are all containers labeled "Hazardous Waste"?

Yes ✓

No

Are all containers marked with an accumulation start date?

Yes ✓

No

Are all containers closed?

Yes ✓

No

Is there adequate aisle space between rows of drums?

Yes ✓

No

Is spill control equipment available?

Yes ✓

No

Observations: NONE

(If containers in poor condition or leaks/spills were found, please note action taken in area below)

Repairs or Remedial Action

Date: 8/10/02



This is to certify that

Barbara Simboli

Has successfully completed

8 Hour Environmental & Safety Refresher Training

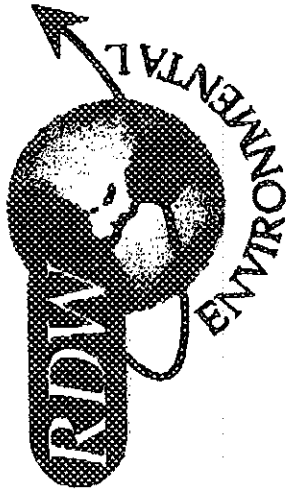
conducted by *R. D. W. Environmental, Inc.*

3605 NE 32nd Avenue Ft. Lauderdale, Florida 33308

October 5, 2000

Date


 Robert Woodward, Instructor



This is to certify that

Jorge Alvarez

Has successfully completed

8 Hour Environmental & Safety Refresher Training

conducted by *R. D. W. Environmental, Inc.*
3605 NE 32nd Avenue Ft. Lauderdale, Florida 33308

October 5, 2000

Date

Robert Woodard, Instructor



This is to certify that

John Nicolosi

Has successfully completed

8 Hour Environmental & Safety Refresher Training

conducted by *R. D. W. Environmental, Inc.*

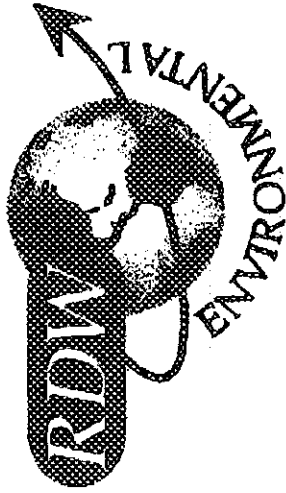
3605 NE 32nd Avenue Ft. Lauderdale, Florida 33308

October 5, 2000

Date

A handwritten signature in black ink, appearing to read "Robert Woodard".

Robert Woodard, Instructor



This is to certify that

Bob Ahmadi

Has successfully completed

8 Hour Environmental & Safety Refresher Training

conducted by *R. D. W. Environmental, Inc.*

3605 NE 32nd Avenue Ft. Lauderdale, Florida 33308

October 5, 2000
Date


Robert Woodward, Instructor

Certificate

This is to certify that

Bob Ahmadi
Photographic Waste Control, Inc.

Has successfully attended the

R. D. W. Environmental

8 Hour Environmental & Safety Refresher Training



Robert Woodard, Instructor

September 14, 1999

Date

Certificate

This is to certify that

John Nicolosi
Photographic Waste Control, Inc.

Has successfully attended the

R. D. W. Environmental
8 Hour Environmental & Safety Refresher Training



Robert Woodard, Instructor

September 14, 1999

Date

Certificate

This is to certify that

Jorge Alvarez
Photographic Waste Control, Inc.

Has successfully attended the

R. D. W. Environmental

8 Hour Environmental & Safety Refresher Training



Robert Woodard, Instructor

September 14, 1999

Date

PHOTOGRAPHIC WASTE
CONTROL, INC.
1943 HIGH STREET
LONGWOOD FL 32758
FAX 407-328-7158
PHONE 800-582-4833

facsimile transmittal

TO ATTENTION: William Kappler 407-893-3167
@ D. E. P.

FR BARBARA DATE: AUGUST, 2002

RE PAGES

Mr. Kappler,

Will the following form be acceptable for logging material coming in and going out of this location? Please advise. The data is "make believe"; just included for effect.

Thank you,

BARBARA (407-328-9651)



PHOTOGRAPHIC WASTE
CONTROL, INC.
1943 HIGH STREET
LONGWOOD FL 32750
FAX 407-328-7158
PHONE 889-582-4833

facsimile transmittal

TO ATTENTION: William Kappler 407-893-3167

@ D. E. P.

FR BARBARA

DATE: AUGUST, 2002

RE

PAGES

Mr. Kappler,

Will the following form be acceptable for logging material coming in and going out of this location? Please advice. The data is "make believe"; just included for effect.

Thank you,

BARBARA (407-328-9651)



PHOTOGRAPHIC WASTE CONTROL, INC.
1943 HIGH STREET
LONGWOOD FL 32750

ID # FLD 984 229 609
800-582-4833
407-328-9651

CLOSURE

1. PWCI SHALL CLOSE THE FACILITY, LOCATED AT 1943 HIGH STREET, LONGWOOD, FL 32750, IN ACCORDANCE WITH THE RULES AND REGULATIONS SET FORTH BY 40 CFR 264.111.
2. PWCI SHALL KEEP A COPY OF THE CLOSURE PLAN, AND ANY REVISIONS TO THE CLOSURE PLAN, UNTIL CLOSURE IS COMPLETED, AND THE DEPARTMENT ACCEPTS THE CLOSURE CERTIFICATE.
3. IN ACCORDANCE WITH 40 CFR 264.112 (d) (1), PWCI SHALL NOTIFY THE DEPARTMENT AT LEAST FORTY-FIVE (45) DAYS PRIOR TO THE DATE IT EXPECTS TO BEGIN CLOSURE OF IT'S LONGWOOD SITE.
4. WITHIN TEN (10) DAYS AFTER RECEIVING THE FINAL VOLUME OF HAZARDOUS WASTE, PWCI SHALL REMOVE FROM THE SITE ALL HAZARDOUS WASTE AND TRANSPORT TO FACILITIES IN FLORIDA FOR DISPOSAL.. THIS SHALL BE SPECIFIED IN THE CLOSURE PLAN AND DONE IN ACCORDANCE WITH 40 CFR 264.113 (3).
5. PWCI SHALL DECONTAMINATE AND / OR DISPOSE OF ALL FACILITY EQUIPMENT AS REQUIRED BY 40 CFR 264.114,264.178 264.197 AND THE CLOSURE PLAN.
6. WITHIN FIFTEEN (15) DAYS FROM THE COMPLETION OF CLOSURE, PWCI SHALL SUBMIT TO THE DEPARTMENT BY CERTIFIED MAIL OR HAND DELIVERY, A CERTIFICATE SIGNED BY PWCI, STATING THAT THE FACILITY HAS BEEN CLOSED IN ACCORDANCE WITH THE SPECIFICATIONS IN THE CLOSURE PLAN.
7. PWCI SHALL PROVIDE THE OPPORTUNITY FOR SITE INSPECTIONS BY THE DEPARTMENT, PRIOR TO AND DURING THE PHYSICAL CLOSURE ACTIVITIES.

RECEIVED
wc
AUG 7 8 2002

FDEP-CENTRAL DISTRICT
HAZARDOUS WASTE

PHOTOGRAPHIC WASTE CONTROL, INC.
1943 HIGH STREET
LONGWOOD FL 32750

ID # FLD 984 229 609
800-582-4833
407-328-9651

8. PWCI SHALL SUBMIT AN APPLICATION TO MODIFY THE CLOSURE PLAN, IF UPON IMPLEMENTATION OF THE CLOSURE PLAN, IT IS DETERMINED THAT PWCI CANNOT PRACTICALLY MEET THE DEADLINE SET IN THE CLOSURE PLAN. PWCI SHALL NOTIFY THE DEPARTMENT WITHIN THIRTY (30) DAYS OF THAT DETERMINATION.
9. PWCI SHALL CONDUCT SAMPLING AND TESTING, BEFORE FINAL CLOSURE. THIS TESTING WILL BE CONDUCTED IN ACCORDANCE WITH THE RULES AND REGULATIONS SET UP BY THE EPA. THE RESULTS OF THE ANALYTICAL TESTS SHALL BE FORWARDED TO THE DEPARTMENT UPON RECEIPT.
10. PWCI WILL SUBMIT TO THE DEPARTMENT, A CERTIFICATE SIGNED BY PWCI, STATING THAT THE FACILITY HAS BEEN CLOSED IN ACCORDANCE WITH THE SPECIFICATIONS IN THE CLOSURE PLAN, PURSANT TO THE REQUIREMENT OF RULE 62-730.260 (6), F.A.C.

PHOTOGRAPHIC WASTE CONTROL, INC.
1943 HIGH STREET
LONGWOOD, FL 32750

ID # FLD 984 229 609
1- 800-582-4833
407-328-9651

**PHOTOGRAPHIC WASTE CONTROL, INC.
1943 HIGH STREET
LONGWOOD, FL 32750
HEADQUARTERS**

**CONTINGENCY PLAN
AND
EMERGENCY PROCEDURES
FOR HAZARDOUS MATERIAL SPILLS**

RECEIVED

AUG 7 2002

FDEP-CENTRAL DISTRICT
HAZARDOUS WASTE

PHOTOGRAPHIC WASTE CONTROL, INC.
1943 HIGH STREET
LONGWOOD FL 32750

ID# FLD 984 229 609
800-582-4833
407-328-9651

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CLOSURE PLAN

PHOTOGRAPHIC WASTE CONTROL, INC.
1943 HIGH STREET
LONGWOOD, FL 32750

ID #FLD 984 229 609
1-800-582-4833
407-328-9651

PHOTOGRAPHIC WASTE CONTROL, INC.

--- SPILL CONTINGENCY PLAN---

THIS DOCUMENT SHALL SERVE AS PHOTOGRAPHIC WASTE CONTROL'S
HAZARDOUS MATERIAL SPILL CONTINGENCY PLAN.

SITE ADDRESS IS:

1943 HIGH STREET
LONGWOOD, FL 32750

*** NEAREST CROSS STREET IS SR 419—HIGH STREET IS DIRECTLY ACROSS THE STREET FROM THE
SEMINOLE COUNTY TRANSFER STATION (ON 419). ***

SITE CONTACTS

- SITE CONTACTS ARE TO BE NOTIFIED **IMMEDIATELY** IN THE EVENT OF A HAZARDOUS MATERIAL SPILL. SITE CONTACTS ARE AVAILABLE 24 HOURS A DAY FOR NOTIFICATION OF A SPILL AND WILL ASSIST THE CALLER WITH PROPER ABATEMENT ACTIVITIES AND ADDITIONAL REPORTING REQUIREMENTS, IF REQUIRED. THE SITE CONTACTS ARE:

**BOB AHMADI – SPILL CONTINGENCY ADMINISTRATOR
CHIEF OPERATIONS OFFICER**

177 PINE STREET
LAKE MARY, FL 32746
HOME 407-322-8014
HOME –LINE 2 407-330-2443
MOBILE 407-592-3315

**ROBERT SANTIAGO – WAREHOUSE
SAFETY & ENVIRONMENTAL AFFAIRS
108 SPREADING OAK COURT**

SANFORD, FL 32773
HOME # 407-328-4971
MOBILE # - 407-227-1390

BARBARA SIMBOLI – OFFICE ADMINISTRATOR

1030 N. WINTER PARK DRIVE
CASSELBERRY, FL 32707
HOME # - 407-695-5953
2nd HOME # - 407-695-4901

EMERGENCY RESPONSES

THIS SECTION OF THE CONTINGENCY PLAN IDENTIFIES OUTSIDE ORGANIZATIONS THAT ARE AVAILABLE FOR EMERGENCY RESPONSE SERVICES. THESE SERVICE AGENCIES AND ORGANIZATIONS ARE TO BE SUMMONED ONLY BY PHOTOGRAPHIC WASTE CONTROL EMERGENCY COORDINATOR OR HIS ALTERNATE.

*** SEMINOLE COUNTY EMERGENCY PERSONNEL SERVICE OUR LOCATION***

FIRE STATION 35----407-665-5100

SHERIFF'S OFFICE (District Center # 3)---407-665-6650

IN CASE OF A	THEN NOTIFY	SIMULTANEOUS ACTIONS
<ul style="list-style-type: none"> • FIRE OR EXPLOSION 	CALL 911 SEMINOLE CO. EMERGENCIES STATION 35 201 W. COUNTY HOME RD SANFORD FL 32773 407-665-5100	<ul style="list-style-type: none"> • EVACUATE FACILITY • TAKE ATTENDANCE • EMERGENCY COORDINATOR ASSISTS RANKING FIRE OFFICIAL
<ul style="list-style-type: none"> • RELEASE OF HARMFUL OR TOXIC GAS OR FUMES 	CALL 911 SEMINOLE CO. EMERGENCIES STATION 35 201 W. COUNTY HOME RD SANFORD FL 32773 407-665-5100	<ul style="list-style-type: none"> • EVACUATE FACILITY • TAKE ATTENDANCE • EMERGENCY COORDINATOR ASSISTS RANKING FIRE OFFICIAL
<ul style="list-style-type: none"> • SPILL OR RELEASE OF HAZARDOUS MATERIALS OR HAZARDOUS WASTES (LARGE SPILLS THAT ARE BEYOND THE SCOPE OF ON-SITE PERSONNEL'S CONTROL) 	CALL 911 --- ALSO---(if required) DEPARTMENT OF ENVIRONMENTAL PROTECTION - CENTRAL DISTRICT 3319 MAGUIRE BLVD. SUITE 232 ORLANDO FL 32803-3767 407-894-7555 PHONE FAX 407-897-2966	<ul style="list-style-type: none"> • EVACUATE FACILITY • TAKE ATTENDANCE • EMERGENCY COORDINATOR EVALUATE THE SITUATION AND POTENTIAL HAZARDS • COORDINATE IN-HOUSE SPILL RESPONSE (MINOR SPILLS) OR CONTACT OUTSIDE RESPONDERS (MAJOR SPILLS)
<ul style="list-style-type: none"> • BOMB THREAT 	CALL 911	<ul style="list-style-type: none"> • EVACULATE FACILITY • TAKE ATTENDANCE • EMERGENCY COORDINATOR ASSISTS RANKING POLICE OFFICIAL
<ul style="list-style-type: none"> • UNAUTHORIZED TRESPASS 	CALL 911 Also, if necessary; FIRST ALERT SECURITY ACCT #271636 MONITORING STATION 1-888-229-7941	<ul style="list-style-type: none"> • DO NOT ENTER BUILDING, BEFORE THE POLICE ARRIVE. • EMERGENCY COORDINATOR & OPERATIONS PERSONNEL CHECK FOR TAMPERING, THEFT, ETC. • RESECURE FACILITY
<ul style="list-style-type: none"> • SPILLS OF LIQUID CHEMICALS (SMALL) 	CALL BOB AHMADI (COORDINATOR)	<ul style="list-style-type: none"> • IF POSSIBLE STOP THE FLOW IMMEDIATELY • DON REQUIRED PERSONAL PROTECTIVE EQUIPMENT • ABSORB THE SPILL (VERMICULITE) • NEUTRALIZE IF MATERIAL IS CORROSIVE • CONTAINERIZE THE SPILLED MATERIAL AND HANDLE AS HAZARDOUS WASTE FOR DISPOSAL

COORDINATION AGREEMENTS

<u>NAME OF ORGANIZATION</u>	<u>FUNCTION</u>
<ul style="list-style-type: none"> • SEMINOLE COUNTY EMERGENCY RESPONSE TEAM STATION 35 201 W. COUNTY HOME ROAD SANFORD FL 32773 407-665-5100 	<ul style="list-style-type: none"> • RESPOND TO FIRES • RESPOND TO EXPLOSIONS • RESPOND TO SPILLS
<ul style="list-style-type: none"> • SEMINOLE COUNTY SHERIFF'S OFFICE DISTRICT CENTER # 3 100 BUSCH BLVD SANFORD FL 32773 407-665-6650 	<ul style="list-style-type: none"> • PRIMARY RESPONDER FOR FACILITY SECURITY AND TRAFFIC CONTROL
<ul style="list-style-type: none"> • SEMINOLE COUNTY EMERGENCY RESPONSE TEAM STATION 35 201 W. COUNTY HOME ROAD SANFORD FL 32773 407-665-5100 	<ul style="list-style-type: none"> • RESPOND TO HAZARDOUS WASTE SPILLS • RESPOND TO RELEASE OF TOXIC SUBSTANCES
<ul style="list-style-type: none"> • FLORIDA HOSPITAL 601 E. ALTAMONTE DRIVE ORLANDO FL ER DEPT. 407-303-2230 	<ul style="list-style-type: none"> • EMERGENCY MEDICAL TREATMENT
<ul style="list-style-type: none"> • FLORIDA HOSPITAL CENTRA CARE 855 S US HWY 17/92 LONGWOOD FL 32750 407-699-8400 	<ul style="list-style-type: none"> • EMERGENCY MEDICAL TREATMENT
<ul style="list-style-type: none"> • DEPARTMENT OF ENVIRONMENTAL PROTECTION – CENTRAL DISTRICT 3319 MCGUIRE BLVD. ORLANDO FL 32803-3767 407-894-7555 FAX 407-897-2966 	<ul style="list-style-type: none"> • WILL ASSIST AND DIRECT CLEAN UP OF HAZARDOUS, NON HAZARDOUS SPILLS

PHOTOGRAPHIC WASTE CO. OL, INC.
 1943 HIGH STREET
 LONGWOOD, FL 32750

ID # FLD 984 229 609
 800-582-4833
 407-328-9651

EMERGENCY EQUIPMENT LIST

ITEM	DESCRIPTION/ CAPABILITY	LOCATION (S)
TELEPHONE S (2) CELL PHONES (4)	TELEPHONE COMMUNICATION FOR EMERGENCY NOTIFICATION	BOB'S OFFICE MAIN OFFICE CELL PHONE IN WAREHOUSE AREA, AND BOTH OFFICES
FIRE EXTINGUISHERS (4)	DRY CHEMICAL EXTINGUISH FIRES	STRATEGICALLY PLACED IN THE WAREHOUSE AND STORAGE AREAS
FIRE HYDRANTS	COMBAT FIRES	LOCATED IN THE GRASSY AREA, DIRECTLY OUTSIDE OUR OFFICE AREA
ABSORBANT MATERIAL	VERMICULITE AND ABSORBANT MATERIAL IN SPILL KITS- ABSORBS LIQUID SPILLS	WASTE STORAGE AREA
RESPIRATORS	FULL FACE FILTER AMBIENT AIR / SUPPLY COMPRESSED AIR	STORAGE AREA -IN CABINET LOCATED NEAR WORK BENCH
EYE WASH BOWL (2)	PERMANENT INSTALLATION //FLUSH EYES	WASTE STORAGE AREA AND SINK AREA
SHOWER	PROVIDE FULL BODY WASH DOWN	CONTAINER STORAGE AREA SINK, AND EYE WASH BOWL
FIRST AID KIT	BANDAIDS, BANDAGES, OINTMENTS, TORNEQUET TWEEZERS ETC./ PROVIDE MINOR FIRST AID	OFFICE AREA , WORK BENCH CABINET AND TRUCKS
PROTECTIVE APRONS & GLOVES	CLOTH, RUBBER - BODY PROTECTION	WASTE STORAGE AREA
SAFETY GLASSES	PERSONAL PROTECTIVE EYEWARE - ANSI RATING Z94.3	WASTE STORAGE AREA, OFFICE AND TRUCKS
HARD HATS (6)	HEAD PROTECTION ANSI Z89.1 RATING	WAREHOUSE
EMERGENCY EXIT LIGHTS & SIGNS (4)	EMERGENCY EGRESS EQUIPMENT	OFFICE DOORS WAREHOUSE DOORS
PORTABLE RADIO	COMMUNICATION DEVICES	WAREHOUSE
SPILL KITS	CLEAN UP MINOR SPILLS	STORAGE AREA
SPILL GUNS (2)	DISCHARGES ABSORBANT MATERIAL	BOTH LOCATED IN THE WASTE STORAGE AREA

Spill Contingency Plan

• **In the event of a liquid hazardous material or hazardous waste spill, Communication Procedures are as follows:**

1. Immediately notify the supervisor to determine the severity of the spill.
2. Evacuate all personnel immediately from the affected area (s), if product exposure irritates eyes or respiratory tract.
3. Notify the spill contingency plan administrator immediately.
4. If the leak/ spill is from a damaged container, over- pack that container into a larger container and proceed with the clean up of the spilled area.
5. If release is determined "significant" dial 911. Give the operator your name, site address, nature of the emergency to include the name of the chemical spilled and request the fire department and the hazardous material response team.
6. If required, testing of the affected area should be done in accordance to local, state and federal regulations to deem the site safe and decontaminated.

Note: a spill is considered significant, if personnel are required to evacuate the work area.

• **If a liquid hazardous material or hazardous waste is spilled, following is The Containment Procedure:**

1. Response trained employee will obtain absorbent from the spill response kit.
2. Employee will attire himself with proper personnel protective equipment, i.e., gloves, apron, and goggles.
3. Determination of required protective equipment can be found in the material safety data sheet.
4. Employee will apply an adequate quantity of absorbent on the spilled liquid.
5. **Note:** Diking the spilled liquid with absorbents is essential, if there is a floor drain in the immediate area.
6. Contaminated absorbents must be scooped up and contained in a disposal bag. The bag will be properly labeled and disposed of in accordance with all local, state and federal regulations.

• **In the event of fire or explosion, The Emergency Procedure is as follows:**

1. Evacuate the facility
2. Call 911, using the cellular phone available to the employees.
3. Give the name of the business, the site location and the nature of the emergency.
4. Take attendance
5. Assist the senior fire official in any way possible.
6. Notify the chief operations officer (Bob Ahmadi)
7. **Note:** if the fire is small, and can be contained by the use of the fire extinguisher, proceed with the use of the extinguisher.
8. **Under no circumstances will any employee attempt to extinguish a blaze that is out of control. Leave it for the professional fire fighters.**

- **In the event of the release of harmful or toxic gases or fumes, The Emergency Procedure will be as follows:**
 1. Evacuate the facility immediately.
 2. Call 911, using the cellular phone made available to the employees.
 3. Identify the problem, give the location address and caller's Name.
 4. Take attendance.
 5. Assist the senior fire official in any way possible.
 6. Have those affected, treated medically.

- **In the event of natural disasters (hurricanes, tornadoes, floods) The Emergency Procedure will be as follows:**
 1. If time allows, check waste container lids, tie down as much as possible, turn off all electricity to the facility.
 2. Notify Seminole County police, that you are evacuating the facility and notify them as to the materials being left at the facility.
 3. Leave emergency contact names and telephone numbers with the dispatcher.
 4. Upon returning to the facility, it is suggested that an officer make a security check of the facility with you and document any mishaps to the property or its' contents.
 5. Notify the chief operations officer (Bob Ahmadi) as to damage and loss of property. Also, the extent of damage, if any, to the containers held in the warehouse; any spills or other problems that are a result of the disaster.

- **In the event of a bomb treat, The Emergency Procedure will be as follows:**
 1. Evacuate the facility immediately.
 2. Take attendance.
 3. Call 911, and identify yourself and the address of the site.
 4. Notify businesses in the immediate area, to allow them time to evacuate.
 5. Assist the senior police official as required.
 6. Notify the chief operations officer (Bob Ahmadi) as to the emergency and keep him informed as permitted.

- The same procedures shall be followed for any emergency situation not covered in this plan. Common sense and the assistance of personnel from the local police and fire departments are to be maintained. Direct all information regarding emergencies to the chief operations officer.

PHOTOGRAPHIC WASTE CONTROL, INC.
1943 HIGH STREET
LONGWOOD, FL 32750

ID# FLD 984 229 609
800-582-4833
407-328-9651

GENERAL INFORMATION

OWNER

BOB AHMADI, PRESIDENT
PHOTOGRAPHIC WASTE CONTROL, INC.
1943 HIGH STREET
LONGWOOD, FLORIDA 32750
407-328-9651
800-582-4833
407-328-7158 FAX
407-592-3315 MOBILE

SITE HISTORY

- OPENED APRIL 1, 1992
- BUILT A SECONDARY CONTAINMENT WALL OF CONCRETE, WITH RE-ENFORCEMENT BARS (8"H X 8"W 30'w X 45'l. (1350 Sq. Ft.)
- OPENED SECOND BAY FOR TANKER STORAGE. THIS BAY HAS THE SAFETY WASH -UP EQUIPMENT (SINK, EYE WASH BOWL, SHOWER)

LICENSES / REGISTRATION / PERMITS

- EPA I.D. NUMBER FLD 984 229 609
- DOT HAZARDOUS WASTE MATERIAL CERTIFICATE OF REGISTRATION
REGISTRATION NUMBER 050100 039 0141J
- SEMINOLE COUNTY OCCUPATIONAL LICENSE STATE LIC.# BBC/DER/EPA APPROVED
(# 037063) OLHS2001082302105
- STATE OF FLORIDA, DEPT. OF HEALTH, DRUGS, DEVICES & COSMETICS
PERMIT # 53: 00005 (AUDIT CONTROL # 035674)

FACILITY STANDARDS

- WASTE STORAGE
 - ✓ WASTE CONTAINERS ARE INSPECTED, AND SEGREGATED (HAZARDOUS and NON HAZARDOUS).
 - ✓ ALL WASTE IS STORED IN DEPARTMENT OF TRANSPORTATION (DOT) APPROVED CONTAINERS THAT RANGE FROM 2.5 gallons TO 55 gallon drums.
 - ✓ WASTE IS SEPERATED, TREATED, FILTERED, PUMPED, AND TRANSPORTED TO VARIOUS FACILITIES THROUGHOUT THE STATE.

FACILITY INSPECTIONS AND SELF AUDITS

- INSPECTIONS AND SELF-AUDITS ARE CONDUCTED ON A ROUTINE SCHEDULE. THE FOLLOWING ITEMS ARE INSPECTED ON A DAILY BASIS:
 - ✓ HOUSEKEEPING PRACTICES
 - ✓ OVERFILL AND LEAKS FROM CONTAINERS
 - ✓ SAFETY AND EMERGENCY EQUIPMENT

PHOTOGRAPHIC WASTE CONTROL, INC.
1943 HIGH STREET
LONGWOOD, FL 32750

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800-582-4833
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DIRECTIONS TO THE SITE

- 17/92 SOUTH TO THE INTERSECTION OF SR 419. TURN LEFT AND FOLLOW THE CURVED ROAD. THE FIRST LEFT TURN IS HIGH STREET. (HIGH ST. IS DIRECTLY ACROSS FROM SEMINOLE COUNTY TRANSFER STATION) GO OVER THE R X R TRACKS, PAST EWELL INDUSTRIES, BEAR TO THE LEFT AND PWCI IS ON YOUR LEFT SIDE, AFTER YOU PASS SUPERIOR TRIM & DOOR TRUCKS . WE ARE AFTER THE GRASSY AREA.

PREPAREDNESS and PREVENTION

- PWCI IS MAINTAINED IN AN ORDERLY FASHION. EMERGENCY EQUIPMENT (TELEPHONES, FIRE EXTINGUISHERS, SPILL KITS) ARE READILY AVAILABLE THROUGHOUT THE SITE.
- THE EQUIPMENT IS ROUTINELY INSPECTED, TESTED AND MAINTAINED .
- THERE IS ADEQUATE SPACE TO ENSURE UNOBSTRUCTED MOVEMENT OF PERSONNEL, WASTE HANDLING EQUIPMENT AND EMERGENCY EQUIPMENT.
- THERE IS NO SMOKING ALLOWED IN THE OPERATIONAL AREAS OF THE FACILITY.

KEY PERSONNEL

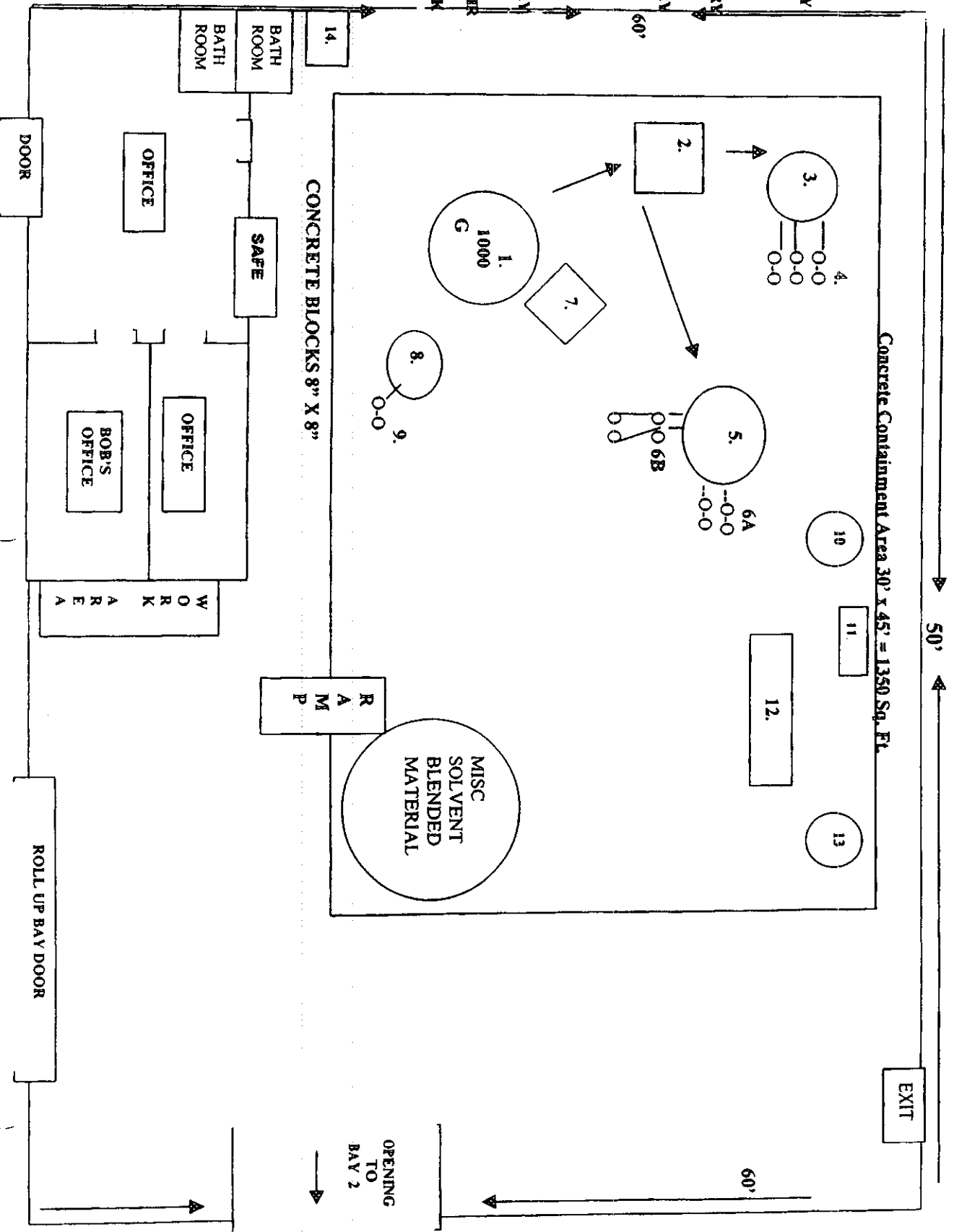
BOB AHMADI
ROBERT SANTIAGO
BARBARA SIMBOLI
ROBERT WOODARD

PRESIDENT (SPILL CONTINGENCY ADMINISTRATOR)
SITE MANAGER
OFFICE ADMINISTRATOR
HEALTH, SAFETY AND ENVIRONMENTAL AFFAIRS

KEY

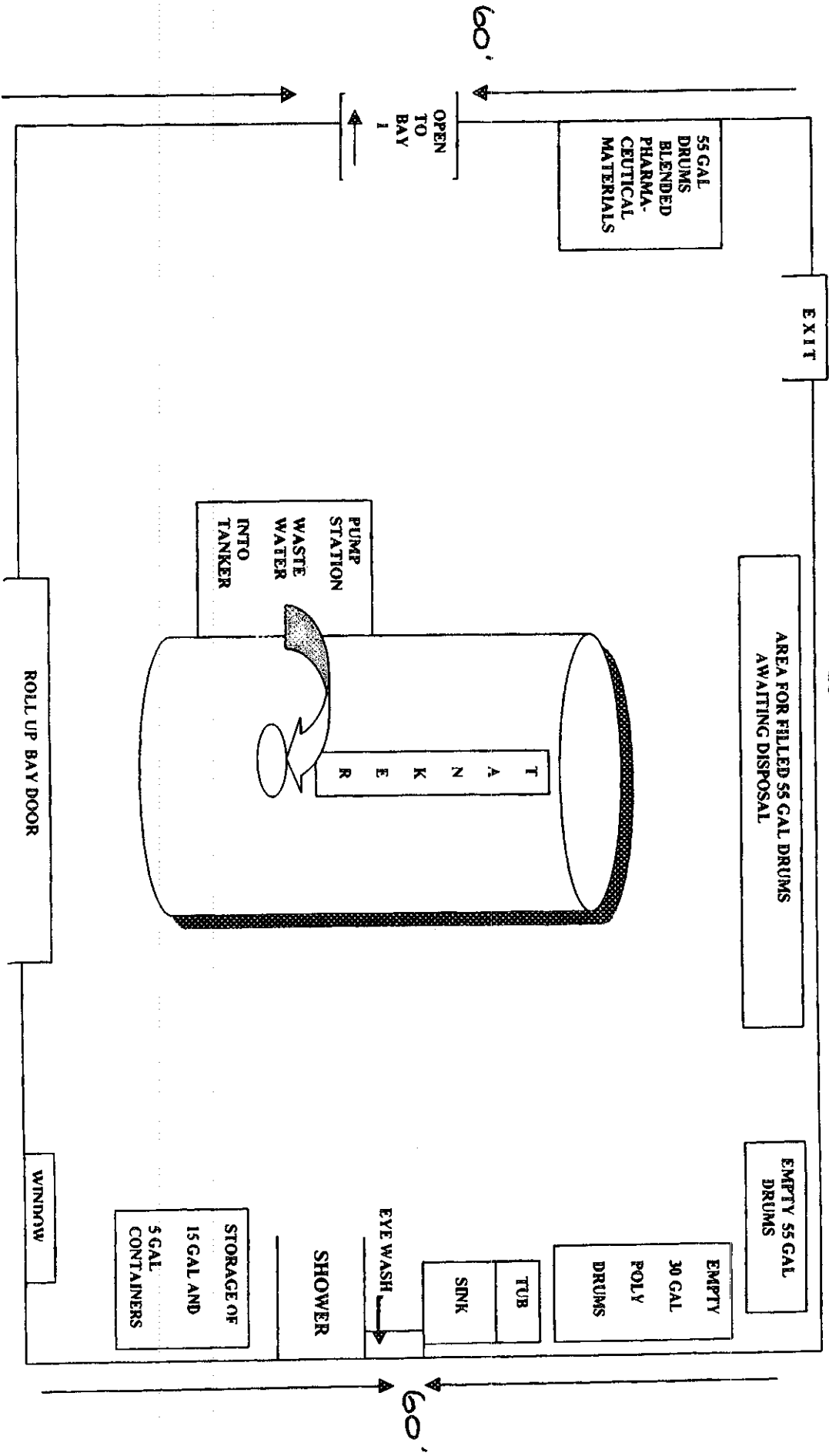
- 1. 1000 G HOLDING TANK
- 2. ELECTROLYTIC SILVER RECOVERY SYSTEM
- 3. TANK # 2
- 4. SILVER RECOVERY CONTAINERS
- TANK # 3
- 6A. SILVER RECOVERY CONTAINERS
- 6B. SILVER RECOVERY CONTAINERS
- 7. CONTAINMENT PALLET
- 8. TANK # 4
- 9. SILVER RECOVERY CONTAINERS
- 10. WATER RESEVOER
- 11. RECEIVING TANK
- 12. DISTILLATOR
- BOILER
- 14. EYE WASHER

FLOOR PLAN BAY 1



FLOOR PLAN BAY 2

25'



60'

60'



Jeb Bush
Governor

Department of Environmental Protection

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

David B. Struhs
Secretary

HAZARDOUS WASTE TRANSPORTER

CERTIFICATE OF APPROVAL

This is to certify that the carrier specified below has been approved as a hazardous waste transporter in Florida. The terms and conditions of this certificate require that the holder comply with all applicable portions of Chapter 62-730, Florida Administrative Code. This certificate shall be rendered null and void if any information contained within becomes obsolete. The certificate shall remain valid through the expiration date specified below.

TRANSPORTER: Photographic Waste Control, Inc.

EPA ID NO: FLD 984 229 609

FACILITY ADDRESS: 1943 High Street
Longwood, Florida 32750

INSURANCE CARRIER: Canal Insurance Company

INSURANCE POLICY #: 364133

EFFECTIVE DATE: September 9, 2001

EXPIRATION DATE: September 9, 2002

APPROVED TRANSFER FACILITY: YES

APPROVAL ISSUED BY: Richard C. Neves DATE: September 7, 2001

Richard C. Neves
Hazardous Waste Management Section
850/488-0300

HAZARDOUS WASTE
FDEP-CENTRAL DISTRICT
AUG 7 2002
RECEIVED

rev. 0 (Oct 91)

"More Protection, Less Process"

Printed on recycled paper.

ACORD CERTIFICATE OF LIABILITY INSURANCE

CSR FM
PHOTO-7

DATE (MM/DD/YY)
11/28/01

PRODUCER
SIHLE INSURANCE GROUP, INC. 1
P. O. BOX 160398
ALTAMONTE SPRINGS FL 32716
Phone: 407-869-0962 Fax: 407-774-0936

THIS CERTIFICATE IS ISSUED AS A MATTER OF INFORMATION ONLY AND CONFERS NO RIGHTS UPON THE CERTIFICATE HOLDER. THIS CERTIFICATE DOES NOT AMEND, EXTEND OR ALTER THE COVERAGE AFFORDED BY THE POLICIES BELOW.

INSURERS AFFORDING COVERAGE

INSURED
PHOTOGRAPHIC WASTE CONTROL
INC.
1943 HIGH STREET
LONGWOOD FL 32750

INSURER A: **Evanston Insurance Co.**
INSURER B:
INSURER C:
INSURER D:
INSURER E:

COVERAGES

THE POLICIES OF INSURANCE LISTED BELOW HAVE BEEN ISSUED TO THE INSURED NAMED ABOVE FOR THE POLICY PERIOD INDICATED. NOTWITHSTANDING ANY REQUIREMENT, TERM OR CONDITION OF ANY CONTRACT OR OTHER DOCUMENT WITH RESPECT TO WHICH THIS CERTIFICATE MAY BE ISSUED OR MAY PERTAIN, THE INSURANCE AFFORDED BY THE POLICIES DESCRIBED HEREIN IS SUBJECT TO ALL THE TERMS, EXCLUSIONS AND CONDITIONS OF SUCH POLICIES. AGGREGATE LIMITS SHOWN MAY HAVE BEEN REDUCED BY PAID CLAIMS.

INSR LTR	TYPE OF INSURANCE	POLICY NUMBER	POLICY EFFECTIVE DATE (MM/DD/YY)	POLICY EXPIRATION DATE (MM/DD/YY)	LIMITS	
A	GENERAL LIABILITY	01PKG00422	09/12/01	09/12/02	EACH OCCURRENCE	\$ 2,000,000
	<input checked="" type="checkbox"/> COMMERCIAL GENERAL LIABILITY				FIRE DAMAGE (Any one fire)	\$ 50,000
	<input type="checkbox"/> CLAIMS MADE <input checked="" type="checkbox"/> OCCUR				MED EXP (Any one person)	\$ 5,000
					PERSONAL & ADV INJURY	\$ 2,000,000
					GENERAL AGGREGATE	\$ 2,000,000
					PRODUCTS - COMP/OP AGG	\$ 2,000,000
					GEN'L AGGREGATE LIMIT APPLIES PER: <input type="checkbox"/> POLICY <input type="checkbox"/> PRO-JECT <input type="checkbox"/> LOC	
	AUTOMOBILE LIABILITY				COMBINED SINGLE LIMIT (Ea accident)	\$
	<input type="checkbox"/> ANY AUTO				BODILY INJURY (Per person)	\$
	<input type="checkbox"/> ALL OWNED AUTOS				BODILY INJURY (Per accident)	\$
	<input type="checkbox"/> SCHEDULED AUTOS				PROPERTY DAMAGE (Per accident)	\$
	GARAGE LIABILITY				AUTO ONLY - EA ACCIDENT	\$
	<input type="checkbox"/> ANY AUTO				OTHER THAN EA ACC AUTO ONLY: AGG	\$
	EXCESS LIABILITY				EACH OCCURRENCE	\$
	<input type="checkbox"/> OCCUR <input type="checkbox"/> CLAIMS MADE				AGGREGATE	\$
	<input type="checkbox"/> DEDUCTIBLE					\$
	<input type="checkbox"/> RETENTION \$					\$
						\$
	WORKERS COMPENSATION AND EMPLOYERS' LIABILITY				WC STATU-TORY LIMITS	OTH-ER
					E.L. EACH ACCIDENT	\$
					E.L. DISEASE - EA EMPLOYEE	\$
					E.L. DISEASE - POLICY LIMIT	\$
A	CONTR. POLLUTION L	01PKG00422	09/12/01	09/12/02		\$2,000,000
	ENV. IMPAIRMENT L	01PKG00422	09/12/01	09/12/02		\$2,000,000

DESCRIPTION OF OPERATIONS/LOCATIONS/VEHICLES/EXCLUSIONS ADDED BY ENDORSEMENT/SPECIAL PROVISIONS
CONTRACTORS POLLUTION LIABILITY \$2,000,000 - ENVIRONMENTAL IMPAIRMENT LIABILITY \$2,000,000 - CLAIMS MADE

CERTIFICATE HOLDER N ADDITIONAL INSURED; INSURER LETTER: _____

CANCELLATION

INFORMA
INFORMATION PURPOSES ONLY

SHOULD ANY OF THE ABOVE DESCRIBED POLICIES BE CANCELLED BEFORE THE EXPIRATION DATE THEREOF, THE ISSUING INSURER WILL ENDEAVOR TO MAIL 10 DAYS WRITTEN NOTICE TO THE CERTIFICATE HOLDER NAMED TO THE LEFT, BUT FAILURE TO DO SO SHALL IMPOSE NO OBLIGATION OR LIABILITY OF ANY KIND UPON THE INSURER, ITS AGENTS OR REPRESENTATIVES.
AUTHORIZED REPRESENTATIVE: *David J. Zedwig*
David Zedwig

ACORD. CERTIFICATE OF LIABILITY INSURANCE

DATE (MM/DD/YY)
AUG 23 01

PRODUCER
INTERSTATE INSURANCE AGENCY, INC.
P.O. BOX 568944
1927 S. FERNCREEK AVE.
ORLANDO FL 32856
PHONE: 407-894-3800
FAX: 407-898-0186

THIS CERTIFICATE IS ISSUED AS A MATTER OF INFORMATION ONLY AND CONFERS NO RIGHTS UPON THE CERTIFICATE HOLDER. THIS CERTIFICATE DOES NOT AMEND, EXTEND OR ALTER THE COVERAGE AFFORDED BY THE POLICIES BELOW.

INSURED
PHOTOGRAPHIC WASTE CONTROL, INC.
1943 HIGH ST.
LONGWOOD FL 32750

COMPANIES AFFORDING COVERAGE

COMPANY A: Canal Insurance Company
COMPANY B:
COMPANY C:
COMPANY D:
COMPANY E:

COVERAGES

THIS IS TO CERTIFY THAT THE POLICIES OF INSURANCE LISTED BELOW HAVE BEEN ISSUED TO THE INSURED NAMED ABOVE FOR THE POLICY PERIOD INDICATED, NOTWITHSTANDING ANY REQUIREMENT, TERM OR CONDITION OF ANY CONTRACT OR OTHER DOCUMENT WITH RESPECT TO WHICH THIS CERTIFICATE MAY BE ISSUED OR MAY PERTAIN. THE INSURANCE AFFORDED BY THE POLICIES DESCRIBED HEREIN IS SUBJECT TO ALL THE TERMS, EXCLUSIONS AND CONDITIONS OF SUCH POLICIES LIMITS SHOWN MAY HAVE BEEN REDUCED BY PAID CLAIMS

GENERAL LTR	TYPE OF INSURANCE	POLICY NUMBER	POLICY EFFECTIVE DATE (MM/DD/YY)	POLICY EXPIRATION DATE (MM/DD/YY)	LIMITS
	GENERAL LIABILITY COMMERCIAL GENERAL LIABILITY CLAIMS MADE OCCUR				EACH OCCURRENCE \$ FIRE DAMAGE (Any One Fire) \$ MED. EXP (Any One Person) \$ PERSONAL & ADV INJURY \$ GENERAL AGGREGATE \$ PRODUCTS-COMP/OP AGG \$
	GEN'L AGGREGATE LIMIT APPLIES PER POLICY PROJECT LOC				
A	AUTOMOBILE LIABILITY ANY AUTO ALL OWNED AUTOS X SCHEDULED AUTOS MIXED AUTOS NON-OWNED AUTOS	364133	SEP 9 01	SEP 9 02	COMBINED SINGLE LIMIT (Per accident) \$ 1,000,000 BODILY INJURY (Per person) \$ BODILY INJURY (Per accident) \$ PROPERTY DAMAGE \$
	GARAGE LIABILITY ANY AUTO				AUTO ONLY - EA ACCIDENT \$ OTHER THAN EA ACC \$ AUTO ONLY AGG \$
	EXCESS LIABILITY OCCUR CLAIMS MADE DEDUCTIBLE RETENTION \$				EACH OCCURRENCE \$ AGGREGATE \$ \$ \$
	WORKERS COMPENSATION AND EMPLOYERS' LIABILITY				WC STATE OTHER \$ \$ E.L. EACH ACCIDENT \$ E.L. DISEASE-EA EMPLOYEE \$ E.L. DISEASE-POLICY LIMIT \$
A	TOTLER:				

DESCRIPTION OF OPERATIONS/LOCATIONS/VEHICLES/SPECIAL ITEMS

CERTIFICATE HOLDER	ADDITIONAL INSURED; INSURER LETTER:	CANCELLATION
PHOTOGRAPHIC WASTE CONTROL INC 1943 HIGH ST LONGWOOD FL 32750		SHOULD ANY OF THE ABOVE DESCRIBED POLICIES BE CANCELLED BEFORE THE EXPIRATION DATE THEREOF, THE ISSUING COMPANY WILL ENDEAVOR TO MAIL DAILY WRITTEN NOTICE TO THE CERTIFICATE HOLDER NAMED TO THE LEFT, BUT FAILURE TO DO SO SHALL IMPOSE NO OBLIGATION OR LIABILITY OF ANY KIND UPON THE INSURER, ITS AGENTS OR REPRESENTATIVES.
Attention:		AUTHORIZED REPRESENTATIVE <i>John M. Hartlieb</i>



Department of Environmental Protection

Jeb Bush
Governor

Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

David B. Struhs
Secretary

TRANSFER FACILITY NOTIFICATION FORM

This form must be completed as required in Florida Administrative Code Rule 62-730.171(3) by transfer facilities storing hazardous waste in accordance with Florida Administrative Code Rule 62-730.171. All information must be typed or printed clearly.

I. Transporters Identification:

Company Name PHOTOGRAPHIC WASTE CONTROL, INC.

E.P.A. ID No. FLD 984 229 609

Company Mailing Address 1943 HIGH STREET

LONGWOOD FL 32750

Principal Contact BOB AHMADI

Phone Number (407) 328-9651

II. Transfer Facility Identification:

Name of Facility PHOTOGRAPHIC WASTE CONTROL, INC.

Street Address 1943 HIGH STREET

LONGWOOD FL 32750

Latitude 28 43' 45' Longitude 81 18' 28'

County SEMINOLE Storage Volume 7500 GALLON

III. Certification

I certify under penalty of law that the above information is accurate and complete. As the owner or operator of the above-referenced hazardous waste transfer facility, I am aware that this facility must comply with the requirements of Florida Administrative Code Rule 62-730.171.

BAHRAM R. AHMADI PRESIDENT
Print/Type Name Title

[Signature] 8-23-2001
Signature of Authorized Representative Date signed

RECEIVED

AUG 7 2002

FDEP-CENTRAL DISTRICT
HAZARDOUS WASTE

Are your services commercially available? YES

STATE OF FLORIDA

HAZARDOUS WASTE TRANSPORTER STATUS FORM

I. Transporter Identification:

Transporter Name: PHOTOGRAPHIC WASTE CONTROL, INC.
Transporter EPA ID: FLD 984 229 609
Location Address: 1943 HIGH STREET
LONGWOOD FL 32750

Contact: BOB AHMADI Telephone: 407-328-9651
Mailing Address: 1943 HIGH STREET
LONGWOOD FL 32750

II. Insurance Information:

Insurance Company: CANAL INSURANCE COMPANY
Address: P.O. BOX 7
GREENVILLE S C 29602

Contact: JOHN HARTLEY Telephone: 407-894-3800
Policy Number: 364133 (INTERSTATE INSURANCE COMPANY)
Expiration date: 9/09/02

III. Waste Information:

EPA Waste Codes for Waste Routinely or Usually Transported:

D001 D011 D002 N/L RCRA F003 F005 F002 D008

Comments: SOME PHOTO CHEMICALS ARE CORROSIVE OR FLAMMABLE

IV. Certification:

I certify under penalty of law that the above information is true, correct, and complete to the best of my knowledge.

BAHRAM R. AHMADI

PRESIDENT

Print/Type Name

B. R. Ahmadi

Title

8-23-01

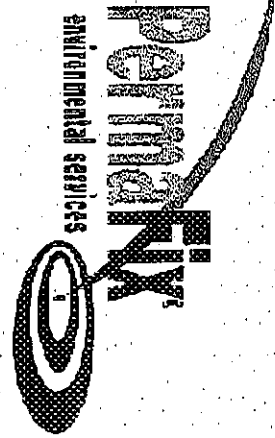
Signature

Date Signed

V. The transporter identified above is in compliance with the financial responsibility requirements for hazardous waste transporters pursuant to Chapter 62-730.170, Florida Administrative Code. The forms submitted by the transporter show compliance with the financial responsibility through _____ Date

Signature of Florida Department of Environmental Protection Representative Date Signed

SEMINOLE FORM 3922-1



This is to certify that

Bob Ahmadi

Has successfully completed

29CFR1910.120 40 Hour Hazardous Waste Training

conducted by Perma-Fix Environmental Services
1940 NW 67th Place, Gainesville, FL 32653

October 12, 2001

Date

Ken Shoemake
 Instructor: Ken Shoemake, EH&S Mgr.

RECEIVED

AUG 7 2002

FDEP-CENTRAL DISTRICT
HAZARDOUS WASTE

SEMINOLE FORM 3022-1



This is to certify that

Barbara Simboli

Has successfully completed

29CFR1910.120 40 Hour Hazardous Waste Training

conducted by Perma-Fix Environmental Services

1940 NW 67th Place, Gainesville, FL 32653

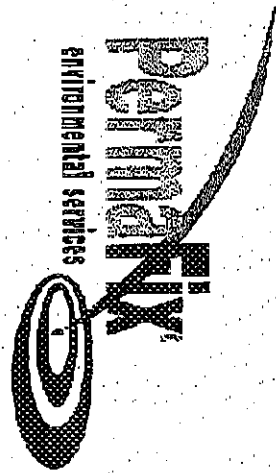
October 12, 2001

Date

Instructor: Ken Shoemaker, EH&S Mgr.

A handwritten signature in black ink, appearing to read "Ken Shoemaker", is written over a horizontal line.

SEMINOLE FORM 3822-1



This is to certify that

Roberto Santiago

Has successfully completed

29CFR1910.120 40 Hour Hazardous Waste Training

conducted by Perma-Fix Environmental Services
1940 NW 67th Place, Gainesville, FL 32653

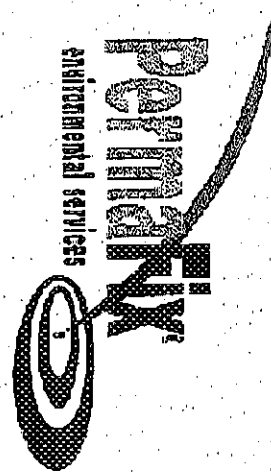
October 12, 2001

Date

Ken Shoemaker

Instructor: Ken Shoemaker, EH&S Mgr.

SEMINOLE FORM 3022-1



This is to certify that

Scott Johnson

Has successfully completed

29CFR1910.120 40 Hour Hazardous Waste Training

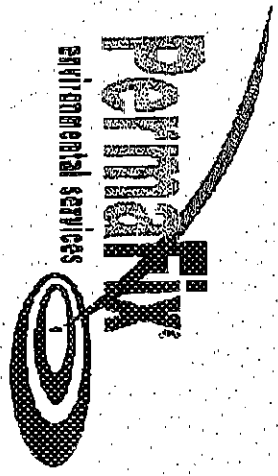
conducted by Perma-Fix Environmental Services
1940 NW 67th Place, Gainesville, FL 32653

October 12, 2001

Date

Ken Shoemaker
Instructor: Ken Shoemaker, EH&S Mgr.

SEMINOLE FORM 3022-1



This is to certify that

John Nicolosi

Has successfully completed

29CFR1910.120 40 Hour Hazardous Waste Training

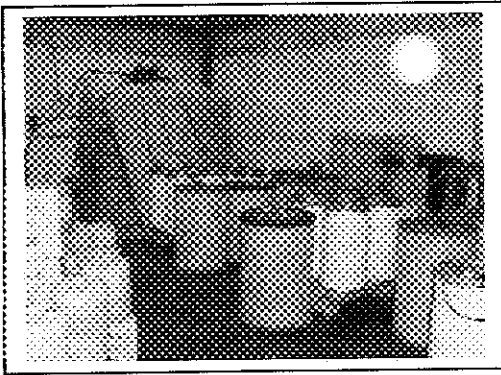
conducted by Perma-Fix Environmental Services
1940 NW 67th Place, Gainesville, FL 32653

October 12, 2001

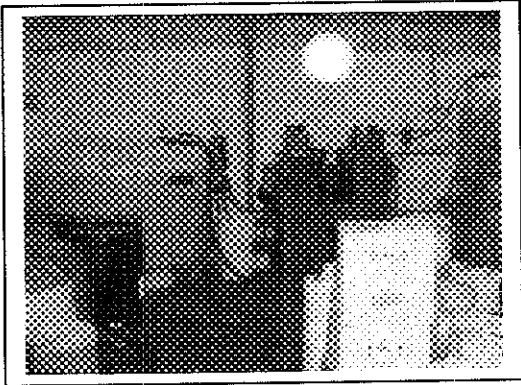
Date

Ken Shoemake

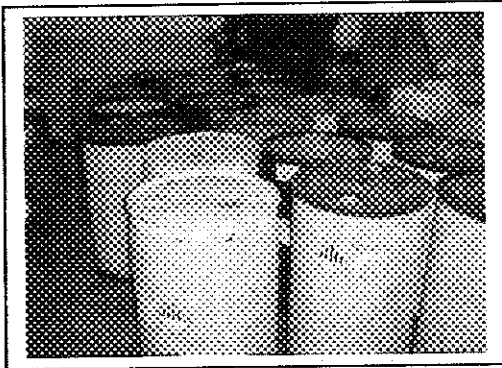
Instructor: Ken Shoemake, EH&S Mgr.



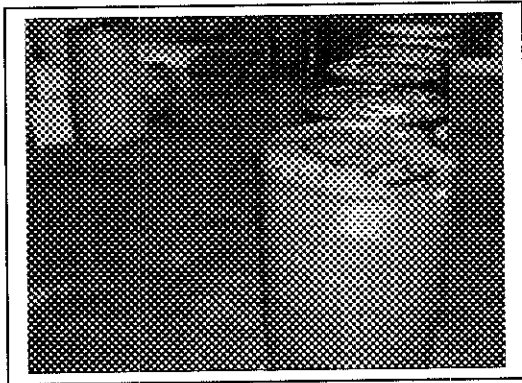
✓
Photographic Waste Control, Inc. 8/7/02.
10:11am. Filter treatment system for photo
fixer solution containing silver. WK



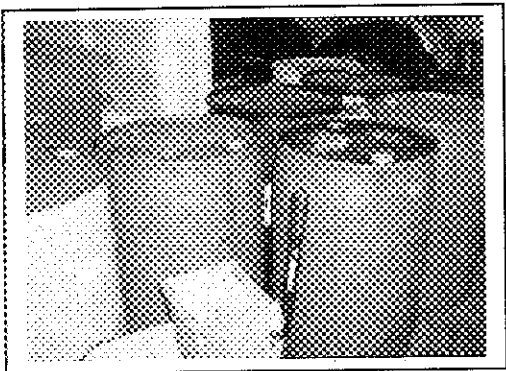
Photographic Waste Control, Inc. 8/7/02.
10:11am. Holding tank for photo fixer
solution containing silver. WK



Photographic Waste Control, Inc. 8/7/02.
10:11am. Hazardous waste storage area.
WK



Photographic Waste Control, Inc. 8/7/02.
10:11am. Hazardous waste storage area.
WK



Photographic Waste Control, Inc.
Hazardous waste storage area. WK

John

I just had a small printer, Marrakech Express, dispose of some waste to this facility (FLD 984 229 609) as the designated facility on a HW manifest. In addition to some D011 photo waste, five gallons is IDed as "Blanket wash (petroleum naphtha) D001" My facility claims to be CESQG which I am still trying to determine. I'm wondering if Photo Waste accepted their non-silver hazardous waste only because Marrakech says they are CESQG, or is Photo Waste a permitted storage facility? or recycling this waste with no storage? I think Marrakech may be determined SQG in the future and I want to let them know if they can still send waste other than D011 to this facility.

There was also 20 gallons of waste IDed as "Environmentally Hazardous Substance, NOS (potassium hydroxide)" with "N/L" filled-in on the Waste No. line. Marrakech says it was a mixture of photo and plate developer, but they hadn't provided Photo Waste with any ID other than this verbal description before the driver picked-it up. Marrakech said no samples or profiles were done before the pick-up.

Thanks for any info you can provide, Randy

FDEP 3804 Coconut Palm Drive, Tampa, FL 33619-8318

FAX

Date: March 13, 1999
Number of pages including cover sheet: 2

To: John White
Central District - HW
Phone:
Fax phone: 407 893-3167
CC:

From: Rarely Strauss
SWDA HW
Phone: (813) 744-6100 X387
Fax phone: (813) 744-6125

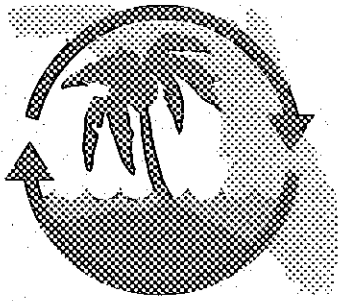
REMARKS: [] Urgent [x] For your review [] Reply ASAP [] Please comment
2/19/99 Manifest for disposal from MarraKach, Tarpon Springs for Photographic Waste Control

Emergency Contact Telephone Number

Please print or type (Form designed for use on a nine (12-pitch) typewriter.)

Form Approved OMB No. 2050-0039 Expires 6-30-96

UNIFORM HAZARDOUS WASTE MANIFEST		1 Generator's US EPA ID No. E X E M P T	Manifest Document No.	2 Page 1 of 1	Information in the shaded areas is not required by Federal law.			
GENERATOR	3 Generator's Name and Mailing Address MARRAKECH, INC 500 ANGLATE RD JACKSON SPRINGS, FL			A State Manifest Document Number CN: 0000 7138				
	4 Generator's Phone (727-) 443-2218			B State Generator's ID SAME				
	5 Transporter 1 Company Name PHOTOGRAPHIC WASTE CONTROL, INC.			6 US EPA ID Number F L D 9 8 4 2 2 9 6 0 9	C State Transporter's ID			
	7 Transporter 2 Company Name			8 US EPA ID Number	D Transporter's Phone			
	9 Designated Facility Name and Site Address PHOTOGRAPHIC WASTE CONTROL, INC. 1943 HIGH STREET LONGWOOD, FL 32750			10 US EPA ID Number F L D 9 8 4 2 2 9 6 0 9	E State Facility's ID			
				F Facility's Phone 407-328-9651				
	11 US DOT Description (including Proper Shipping Name, Hazard Class, and ID Number)			12 Containers		13 Total Quantity	14 Unit Wt/Vol	15 Waste No.
	a HAZARDOUS WASTE LIQUID NOS (SILVER THIO SULFATE) 9, UN3082, III			001 D F 00001 G		Doll		
	b ENVIRONMENTALLY HAZARDOUS SUBSTANCE LIQUID NOS 9, UN3082, III (POTASSIUM HYDROXIDE)			004 D F 00020 G		ML		
	c BLANKET WASH (petroleum naphtha) WASTE FLAMMABLE LIQUID NOS, 3, UN1992			003 D F 00003 G		Doll		
J Additional Descriptions for Materials Listed Above PHOTOGRAPHIC WASTE; CONSTITUENTS: a-ACETIC ACID, AMMONIUM THIO SULFATE, SILVER CHLORIDE PH b-HYDROQUINONE, SODIUM SULFITE, POTASSIUM DIPHOSPHATE c-petroleum naphtha			K Handling Codes for Wastes Listed Above M010 ; M120 ERG #31 9, ERG # 27 EN800-582-4833					
15 Special Handling Instructions and Additional Information								
16 GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes and prevents and future threat to human health and the environment. OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.								
Printed/Typed Name X Sherry Copperman			Signature <i>[Signature]</i>			Month Day Year 10/21/99		
TRANSPORTER	17 Transporter 1 Acknowledgment of Receipt of Materials			Signature <i>[Signature]</i>			Month Day Year 10/21/99	
	18 Transporter 2 Acknowledgment of Receipt of Materials			Signature			Month Day Year	
19 Discrepancy Indication Space C								
FACILITY	20 Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19							
	Printed/Typed Name BOB AHMADI			Signature <i>[Signature]</i>			Month Day Year 10/21/99	



**Photographic Waste
Control, Inc.**

Protecting You and the Environment



Mr. John White
Department of Environmental Protection
3319 Maguire Boulevard Suite 232
Orlando, FL 32803-3767

December 11, 1995

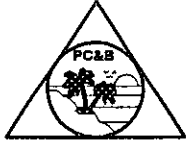
Dear Mr. White:

We have recently analyzed two samples for total silver on prestablized liquid, and enclosed a copy of the report for your records. If you wish to receive a copy of the results for future analysis, please let us know so to be forwarded as it becomes available.

We welcome your questions, comments, or recommendations.

Sincerely,

Bob R. Ahmadi



PC&B Environmental Laboratories, Inc.

210 Park Road, Oviedo, Florida 32765
Phone: 407-359-7194 Fax: 407-359-7197

Client : Photographic Waste Control
1943 High Street
Longwood, FL 32750-

Contact : Bob Ahmadi
Phone : (800) 582-4833

Laboratory Reference Number : 95110163

Project Name :
Project Number :

Laboratory ID	Matrix	Client ID	Status	Date/Time Sampled
95110163-1	Liquid	PRESTAB-1	RUN	11/20/1995
95110163-2	Liquid	PRESTAB-2	RUN	11/21/1995

Number	Parameter	Description
2	EPA 200.7	Silver by ICAP

PC&B Environmental Laboratories, Inc.
210 Park Road
Oviedo, FL 32765
PHONE: 407-359-7194

Report of Analysis

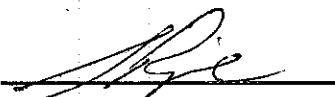
CLIENT NAME: Photographic Waste Control
PROJECT NAME:
PROJECT NUMBER:
DATE RECEIVED: 11/21/1995

Lab Reference Number	95110163-1	95110163-2
Client Sample ID	PRETAB-1	PRETAB-2
Date Sampled	11/20/1995	11/21/1995
Sample Matrix (as Received)	Liquid	Liquid
EPA 200.7	Silver, Total	ug/l
	1600	1400

U = Undetected. The value preceding the 'U' is the MDL for the analyte.

FDEP CompQAPP # 900134G - FHRS Certification # E83239/83353

Reviewed by:



Quality Control Report for Spike Analysis

INORGANICS

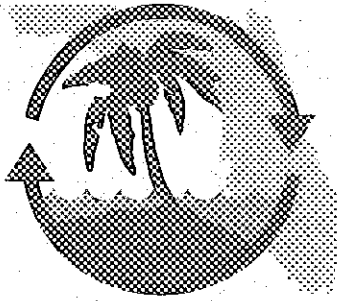
Matrix: Water

Lab Sample ID: RB-11-22

Analysis Date: 11/22/1995

Preparation Date: 11/22/1995

Analyte	Spike Amount	Sample Result	Spike Result	Percent Recovery	Lower Control Limit	Upper Control Limit
Silver, Total	100 ug/l	0	93	93	54	124



**Photographic Waste
Control, Inc.**

Protecting You and the Environment



Department of Environmental Protection
3319 Maguire Boulevard Suite 232
Orlando, Florida 32803-3767

Attention: Mr. John White

Dear Mr. White:

Upon receipt of your report, we sent a sample of concentrated liquid for analysis of total silver content, and resulted in 6.95 PPM.

We took immediate action by replacing primary cartridges, and returning the concentrated liquid to holding tank for second recovery. Later on we sent two samples that withdrawn in two different days of recovery to be analyzed. Results are 1.64, 1.67 PPM. However these are for pre-concentrated liquid.

We are going to submit another sample to be analyzed, after concentration, and will inform you as soon as the results back to us. Also we have taken action toward your recommendations on the report.

We welcome your further questions, comments, or recommendations.

Sincerely,

Bob R. Ahmadi

Date 9/11/1995

PC&B Environmental Laboratories, Inc.
210 Park Road
Oviedo, FL 32765
PHONE: 407-359-7194

Report of Analysis

CLIENT NAME: Photographic Waste Control
PROJECT NAME:
PROJECT NUMBER:
DATE RECEIVED: 08/18/1995

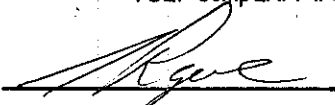
Lab Reference Number	95080098-1
Client Sample ID	PRE STAB-1
Date Sampled	08/18/1995
Sample Matrix (as Received)	Liquid

EPA 200.7	Silver, Total	ug/l	6950
-----------	---------------	------	------

U = Undetected. The value preceding the 'U' is the MDL for the analyte.

FDEP CompQAPP # 900134G - FHRs Certification # E83239/83353

Reviewed by:



PC&B Environmental Laboratories, Inc.
210 Park Road
Oviedo, FL 32765
PHONE: 407-359-7194

Report of Analysis

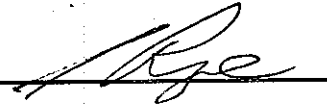
CLIENT NAME: Photographic Waste Control
PROJECT NAME:
PROJECT NUMBER:
DATE RECEIVED: 08/30/1995

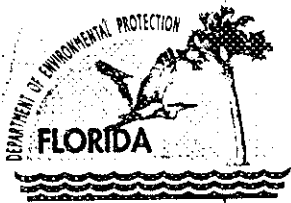
Lab Reference Number		95080168-1	95080168-2
Client Sample ID		1	2
Date Sampled		08/29/1995	08/30/1995
Sample Matrix (as Received)		Water	Water
EPA 200.7	Silver, Total	ug/l 1640	1670

U = Undetected. The value preceding the 'U' is the MDL for the analyte.

FDEP CompQAPP # 900134G - FHRS Certification # E83239/83353

Reviewed by:





Department of Environmental Protection

Lawton Chiles
Governor

Central District
3319 Maguire Boulevard, Suite 232
Orlando, Florida 32803-3767

Virginia B. Wetherell
Secretary

CERTIFIED
Z-188 599 109

Photographic Waste Control
1943 High Street
Longwood, Florida 32750

OCD-HW-95-0299

Attention: Mr. Bob Ahmadi

Seminole County - HW
Photographic Waste Control
Hazardous Waste Compliance Inspection


Dear Mr. Ahmadi:

A hazardous waste compliance inspection was conducted at your facility on June 20, 1995. This inspection was conducted under the authority of Section 403.091, Florida Statutes, and Chapter 403, Part IV, Florida Statutes, and is designed to ascertain the compliance status of your facility with 40 CFR Parts 260-268, adopted in Florida Administrative Code Chapter 62-730.

Attached is a RCRA Hazardous Waste Inspection Report which contains a request for further information on the nature of the waste generated by your vacuum evaporator and makes recommendations to improve waste management procedures.

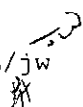
If you have any questions, please contact John White or Jennifer Hobbs, Hazardous Waste Program, at (407)893-3323.

Sincerely,

for 
W. M. Bostwick, Jr. P.E.
Program Administrator
Waste Management

8/11/95
Date

WMB/jw

cc:  Seminole County Environmental
Tallahassee
EPA Region IV

Attachment: RCRA Inspection Report

"Protect, Conserve and Manage Florida's Environment and Natural Resources"

FLORIDA DEPARTMENT OF ENVIRONMENTAL PROTECTION

HAZARDOUS WASTE INSPECTION REPORT

1. INSPECTION TYPE: COMPLAINT ROUTINE FOLLOW-UP PERMITTING
FACILITY NAME Photographic Waste Control DEP/EPA ID# FLD984229609
STREET ADDRESS 1943 High Street, Longwood, Florida 32750
MAILING ADDRESS Same
COUNTY Seminole PHONE (407)328-9651 DATE 06/20/95 TIME 1035

NOTIFIED AS:

Non-Handler
 CESQG (100 kg/mo.)
 SQG (100-1000 kg/mo.)
 Generator (1000 kg/mo.)
 Transporter
 Transfer Facility
 Interim Status TSD Facility
 TSD Facility
Unit Type(s):
 Exempt Treatment Facility
 Used Oil

CURRENT STATUS:

Non-Notifier
 Non-Handler
 CESQG (100 kg/mo.)
 SQG (100-1000 kg/mo.)
 Generator (1000 kg/mo.)
 Transporter
 Transfer Facility
 Interim Status TSD Facility
 TSD Facility
Unit Type(s):
 Exempt Treatment Facility
 Used Oil

2. Applicable Regulations:

40 CFR 261.5 40 CFR 262 40 CFR 263 40 CFR 264
 40 CFR 265 40 CFR 266 40 CFR 268 40 CFR 279

3. Responsible Officials:

Bahram (Bob) Ahmadi

4. Survey Participants and Principal Inspector:

John White - FDEP
Jennifer Hobbs - FDEP
Tom Waters - Seminole County
Bob Ahmadi - PWC

5. Facility Location: Latitude: 28°43'45" Longitude: 81°18'28"

6. SIC Code: 7389, Business Services, nec.

7. Type of Ownership: FEDERAL STATE COUNTY MUNICIPAL **PRIVATE**

Photographic Waste Control
August 3, 1995
Page 3

8. Permit No.: None

Date Issued:

Exp. Date:

I. NARRATIVE:

On June 20, 1995, John White and Jennifer Hobbs, Florida Department of Environmental Protection, accompanied by Tom Waters, Seminole County, and Bahram R. Ahmadi, Photographic Waste Control Site Operator, inspected the facility for compliance with hazardous waste standards.

Photographic Waste Control is a hazardous waste transporter and transfer facility which services small businesses generating waste photographic chemicals and related materials.

Waste photographic fixer and developer, toner, spent photo-processing chemicals, and waste inks are transported from generator locations to the transfer facility, which also houses the silver recovery operation, located at 1943 High Street, Longwood, Seminole County, Florida.

Spent photographic fixer containers are emptied into one 500-gallon, above ground tank and photographic developer into a second 500-gallon, above ground tank. The spent fixer, which contains silver, is processed through Mark 26 recovery columns to remove the silver. The processed fixer waste then accumulates in a 500-gallon, above ground tank. The processed fixer is tested using a piece of copper. If no silver plates out onto the copper, the waste is assumed to contain less than 5 parts per million silver.

Spent photographic developer, which contains no silver, and the processed fixer waste, are then treated in a Licon vacuum evaporator. The vacuum evaporator separates contaminants from the water portion of the waste.

The facility processes about 140 gallons of waste during a 6-7 hour operating day. Processing of the waste through the vacuum evaporator generates two waste streams; distilled water and sludge. Distilled water is used in the facility's cooling tower. The liquid waste/sludge portion, which was separated from the water, goes into 55-gallon drums where it is mixed with sawdust. The solidified mixture is managed in a nonhazardous waste landfill in Georgia. The Licon, which sits on a concrete pad and is surrounded by a curb, is cleaned from time to time with small amounts of chromic acid.

Approximately 71 55-gallon drums of Licon sludge/sawdust were accumulating in a room adjacent to the processing area. There are waste analysis results available for the sludge/sawdust that indicate the mixture does not exhibit a characteristic of hazardous waste. There has been no analysis on the sludge prior to mixing with sawdust.

Toner, which exhibits a characteristic of ignitability (D001), is accepted from some small businesses. Waste inks are accepted in 1-gallon containers. Inks which have hardened are thrown out - managed as nonhazardous waste. Material Safety Data Sheets provided for inks managed by Photographic Waste Control do not appear to exhibit characteristics of hazardous waste.

Bins within the warehouse are used to collect x-ray film. The film is separated according to the amount of coverage, which is related to the amount of silver potentially present. The film is shipped to DuPont for silver recovery.

All containers of hazardous waste from Conditionally Exempt Small Quantity Generators (CESQG's) have the words "Hazardous Waste" on them, however, the generators name is not listed.

Review of the facility's paperwork included insurance information, training records and manifests. No violations of these requirements were found.

II. POTENTIAL NON-COMPLIANCE ITEMS:

40 CFR 262.11 - A hazardous waste determination must be made on sludge/liquid waste generated by the Licon. The waste must be tested for hazardous waste characteristics prior to being mixed with sawdust. Assessing the waste prior to processing in the vacuum evaporator will not provide accurate information on the hazardous characteristics of the waste after processing.

Within 30 days of receipt of this report, please submit analytical results for liquid/sludge waste generated by the Licon.

III. RECOMMENDATIONS:

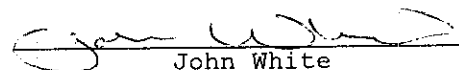
62-730.171(2)(e) requires the owner or operator of a transfer facility to maintain a written record of when all hazardous waste enters and leaves the facility. This record shall include the generator's name, the generator's EPA/DEP identification number, and the manifest number. For conditionally exempt small quantity generators without EPA/DEP identification numbers, the record shall include the name and address of the generator.

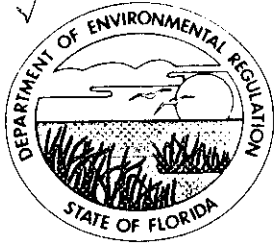
Drums picked up from CESQG's should have the name and other identifying information on the generator on the drum label. This will allow the facility to identify the generator if a problem should be found with a container or the waste.

Also, when possible, please inform your CESQG customers, that Florida Administrative Code Rule 62-730.030(3) requires a conditionally exempt small quantity generator which chooses to send its hazardous waste to an off-site treatment, storage or disposal facility to document delivery of its hazardous waste through written receipts and other records which must be retained for at least three years.

The facility should always request waste identification information for inks accepted for disposal. The information must be specific for the type of ink being accepted. Also, please be aware, a waste stream may exhibit different characteristics than the original product. If cleaning solvents have been mixed with the inks, the waste may be regulated as hazardous waste and must be managed as such.

Report Prepared By:


John White
Environmental Specialist



Camp Files

Florida Department of Environmental Regulation

Central District • 3319 Maguire Boulevard, Suite 232 • Orlando, Florida 32803-3767

Lawton Chiles, Governor

Carol M. Browner, Secretary

December 30, 1992

Mr. Bahram R. Ahmadi
Photographic Waste Control Inc.
1943 High Street
Longwood, Florida 32750

OCD-HW-92-0659

Seminole County - HW
Photographic Waste Control Inc.
RE: Volume Reduction of Hazardous Waste and
Precious Metal Recycling

Dear Mr. Ahmadi:

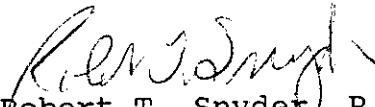
The Department has determined that Photographic Waste Control Inc. does not need a permit to operate a volume reduction process since they are recycling a precious metal.

Photographic Waste Control has received their EPA Transporter Number (FLD984229609), and is allowed to transport hazardous waste from generators to their facility for volume reduction and precious metal recycling. The sludge generated from the recycling process will be tested for further determination. If the sludge is not hazardous it will be disposed of as a non-regulated waste, but if it is determined to be a hazardous waste, the sludge will be manifested for proper disposal.

The wastewater generated through the reduction process will not be disposed of at the Publicly Owned Treatment Works (POTW) plant as originally planned. Since a cooling tower is utilizing this wastewater, we suggest you contact the Air Section regarding the possible need for a permit.

Please do not hesitate to contact the Hazardous Waste Section at (407) 894-7555 if you have any questions.

Sincerely,


Robert T. Snyder, P.E.
Program Manager
Hazardous Waste Section

RTS/mm
7/11/92

MEMO TO THE FILE

RE: PHOTOGRAPHIC WASTE CONTROL INC.
1943 HIGH STREET
LONGWOOD, FLORIDA 32750
(407) 328-9651

DATE: DECEMBER 8, 1992

FROM: MARY MCGEHEE

Discussion with Linda Lakes regarding Photographic Waste Control.
Her two concerns were:

1. Is the sludge generated from the waste reduction planning to manifested as hazardous waste or will it go for further reclamation?

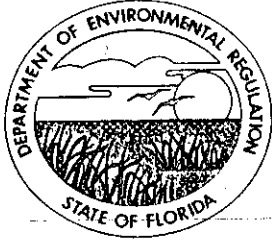
The sludge will be manifested but sent for reclamation.

2. Will they be testing the waste water generated before delivering it to the wastewater treatment plant?

After a discussion with Bahram Ahmadi, there is no wastewater to dispose of at the wwtp. They now have a cooling tower which used the wastewater they have generated. I suggested Mr. Ahmadi contact the Air Section regarding possible permits needed for operation of the cooling tower.

Photographic Waste Control has received their EPA transporter number (FLD984229609).

In conclusion, a letter will be sent to Mr. Ahmadi summarizing acceptance from the Department for Photographic Waste Control to transport and reduce the volume of waste generated from generators. The sludge will be manifested as hazardous waste to the facility which they have purchased their equipment (name ??) for further reclamation of the silver. A suggestion will be made that they contact the Air Section regarding the possible need for permitting the cooling tower.



Florida Department of Environmental Regulation

Central District • 3319 Maguire Boulevard, Suite 232 • Orlando, Florida 32803-3767

Lawton Chiles, Governor

Carol M. Browner, Secretary

MEETING ATTENDANCE RECORD

Purpose: Meeting w/
Photographic Waste Control

Date: July 30, 1992

Name (please print)

Affiliation

Mary McGehee

FDER

BOB SNYDER

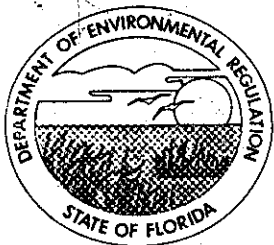
FDER

HAMED RAFIEE

PHOTOGRAPHIC WASTE CONTROL, INC.

BAHRAM R. AHMADI

Photographic Waste Control Inc



Florida Department of Environmental Regulation

Central District • 3319 Maguire Boulevard, Suite 232 • Orlando, Florida 32803-3767

Lawton Chiles, Governor

Carol M. Browner, Secretary

March 18, 1992

Mr. Hamed Rafiee
9125 Tivoli Place
Boca Raton, FL 33434

OCD-HW-92-0123


Dear Mr. Rafiee:

The Department has no objection to the Photographic Waste Control of Florida Pilot Plan submitted on January 18, 1992 provided this business will meet the following criteria:

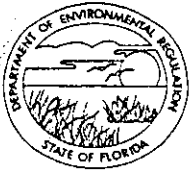
1. Photographic Waste Control of Florida must not accept waste from any generator unless they are Conditionally Exempt Small Quantity Generators (CESQG). It will be the responsibility of Photographic Waste Control of Florida to determine the generator status of their potential customers as outlined in Item #1 of the January 18, 1992 response.
2. In accordance with 40 CFR (Code of Federal Regulations) Part 262.11, the facility must determine if sludge and/or other waste generated during the treatment of waste from the CESQGs is hazardous. Testing should include at a minimum the Toxicity Characteristics Leaching Procedure (TCLP) for metals and organics, characteristic for ignitability, and characteristic for corrosivity.
3. Any hazardous waste generated by Photographic Waste Control of Florida must be properly disposed of. This facility must comply with all applicable regulations contained in 40 CFR and the Florida Administrative Code 17-730.
4. Before Photographic Waste Control of Florida accepts waste from any facility other than a facility with CESQG status they must have obtained appropriate permits from the Department of Environmental Regulation for storage and/or treatment of hazardous waste.

Please do not hesitate to contact Mary McGehee of the Hazardous Waste Section at (407) 894-7555 if you have any questions.

Sincerely,


Robert T. Snyder, P.E.
Program Manager
Hazardous Waste Section

mm
RTS/mm



Florida Department of Environmental Regulation

Central District • 3319 Maguire Boulevard, Suite 232 • Orlando, Florida 32803-3767 • 407-894-7555
Lawton Chiles, Governor Carol M. Browner, Secretary Alex Alexander, District Director

FAX TRANSMITTAL LETTER

TO:

NAME: Hamed Rajee

AGENCY: _____

TELEPHONE NUMBER (FAX No.) 305 791-1844

NUMBER OF PAGES (including cover sheet): 6

FROM:

NAME: Mary M^e Gehee

AGENCY: DER - Orlando

(Transmitted on a Hitachi HIFAX)

Orlando FAX Telephone Number (407) 897-2966 - S/C: 342-2966

IF ANY OF THESE PAGES ARE NOT CLEARLY RECEIVED, PLEASE CALL IMMEDIATELY AT

Phone Number: 407-894-7555 (S/C: 325-1011)

SENDER'S NAME: _____

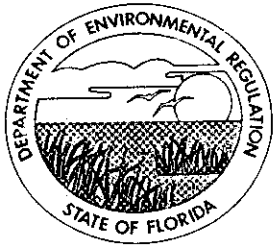
COMMENTS: 1/0 CFR can be obtained thru the

US Government Printing Office

P.O. Box 35089

Jacksonville, Fl. 32202

(904) 791-3801



Florida Department of Environmental Regulation

Central District • 3319 Maguire Boulevard, Suite 232 • Orlando, Florida 32803-3767

Lawton Chiles, Governor

Carol M. Browner, Secretary

February 6, 1992

Hamed Rafiee
9125 Tivoli Place
Boca Raton, FL 33434

OCD-HW-92-0045

Subject : Photographic Waste Control of Florida Pilot Plan

Dear Mr. Rafiee:

This is to inform you the Department is in receipt of the information packet responding to the concerns conveyed in our letter of January 15, 1992. We will review your comments at the earliest convenience and provide a suitable response.

Please understand because of a hiring freeze limiting our resources to review matters such as this we are unable to interrupt our normal review process to provide special consideration to any projects.

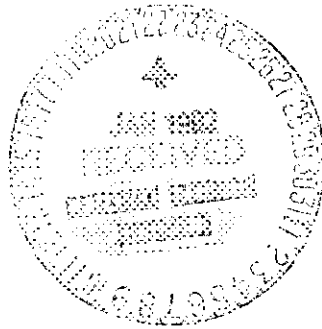
Please do not hesitate to contact the Hazardous Waste Section at (407) 894-7555 if you have any questions.

Sincerely,

Mary McGehee for

Robert T. Snyder, P.E.
Section Manager
Hazardous Waste Program

RTS/^{MM}mm



MARY

January 18, 1992

Mr Robert Snyder, P.E
Section Manager
Department of the Environmental Regulation
Hazardous Waste Program
Orlando, Fl. 32803

Dear Mr Snyder:

The following are our responses to the concerns outlined in your letter dated 1/15/92:

1. The Photographic Waste Control Inc. will ask every customer to fill out a questionnaire before signing the service contract agreement. This questionnaire will document the total amount of all of the hazardous wastes generated by the customers' facility.

Prior to signing the contract with the customer a review of the questionnaire will be done by our qualified personnel to determine the status of the customer as a generator. This status determination will be done based on the criteria set forth on page (9) of the Florida's Handbook for the Small Quantity Generators of Hazardous Waste published by the DER. If it is determined that the customer status is Conditionally Exempt Small Quantity Generator we will sign a contract agreement with that customer indicating his/her status as a generator. If at one time a customer under agreement changes his/her status to become a Small Quantity Generator or a Generator, we will stop providing services to that customer.

As mentioned in our pilot plan we intend to use the manifest system (Although not required by EPA) for better record keeping of the waste handling.

The manifests and the contract agreements will be presented to the Department inspectors upon request.

2. We would like to offer our services to the Conditionally Exempt Small Quantity Generators immediately after the approval from DER and the Seminole County. Our goal is to extend these services to the Small Quantity Generators after a period of six months to a year depending on the market demand.

3. Starting April 1st, 1992 the operators of vehicles transporting hazardous materials are required by the DOT to possess a Commercial Driver License (CDL) with the hazardous waste endorsement.

AS PER RESOLUTION
THE DETERMINATION
CONDITIONALLY EXEMPT

WILL BE
MUST BE APPROVED

MUST BE APPROVED
MAY BE APPROVED

5

4. As shown on the submitted floor plan the initial recovery of silver will be done by the automated units using electrolysis. the solution after being introduced to these units will be discharged when the unit Amperage indicator shows zero meaning that all of the silver has been recovered.

Experience has shown that some silver residue is still present after completion of this initial recovery. This silver residue is collected during the secondary silver recovery performed by the Ion Exchange Units.

The solution after the completion of the secondary recovery will be tested to determine its silver content. Please be aware that the silver test paper is only used as a quick method for determining when the cartridges are ready to be rotated. We will analytically test the outcoming solutions from the Ion Exchange Units everyday at our facility and by an outside laboratory after processing of every 1000 gallon of solution. The results of these tests will be kept on records to be presented to the Department inspectors upon request.

5. The setup at our facility will be based on a continuous system. The waste solutions will be processed immediately upon arrival to our facility.

For the first six month of our operation our estimated waste solution processing volume will be 20 - 25 Gallons per day. This volume might change in the future as explained in no. 2.

Our potential customers are the Conditionally Exempt Small Quantity Generators in the following industries.

- Doctors
- Printers
- Dentists
- Quick processing photo labs
- Typesetters and designers

6. The treatment process is different for each type of solution. There are two types of solutions that are dealt with at all times. These are Fixer and Developer solutions. The distinguishing factor between these solutions is the PH indication.

Fixer solution has a PH of 3-5 and is of two types of Color (Bleach Fixer) and Black and White. The Developer solution is either regular (PH 8-12) or is of the Stabilizer type (PH of 5-7).

Handwritten notes:
- 1000 Gallons per day
- 1000 Gallons per day
- 1000 Gallons per day
- 1000 Gallons per day

Handwritten note:
- 1000 Gallons per day

All solutions are collected separately by the customer in pre-determined labeled containers. Our representative will verify the type of solution in each container by using a PH paper prior to pick up. Each solution is processed at our facility as soon as it is arrived. The following will explain the process in more details (Please refer to the attached floor plan):

Fixer Solution

The Black and White Fixer will be transferred to 50 gallon holding tank No.1. The automated feed and dispensing silver recovery unit will start to di-silverize the solution immediately. The outcoming solution is fed into the 15 Gallon pumping station No. 3 for further processing.

the Bleach Fixer solution will be transferred to a 50 gallon tank No. 10. This solution will also be transferred to the 15 Gallon pumping station No. 3 for further processing after its silver is recovered.

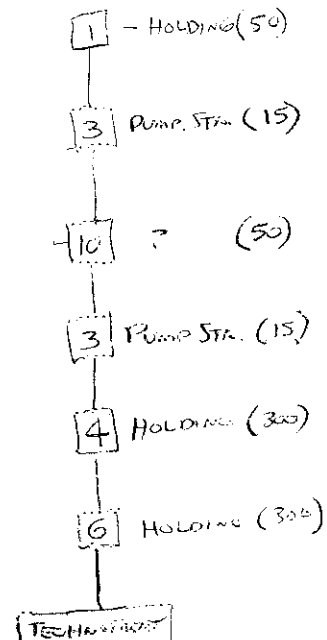
Holding tank No. 4 is a 300 gallon capacity elevated tank which will hold the incoming solution from the pumping station for the slow process of the secondary silver recovery operation to be performed by the Ion Exchange Units. After completion of the secondary silver recovery The solution will be transferred to the 300 gallon holding tank No. 6 to be introduced to the waste water separator unit (Technotreat).

Developer Solution

The regular Developer solution will be transferred to a 300 gallon holding tank No. 11. The solution will be introduced to the waste water separator immediately.

The Stabilizer solution bears minimal silver this solution and any other Developer solution that has been contaminated with Fixer solution will be transferred into the holding tank No 4 for further processing.

It should be noted that there is a type of Developer used by the printing companies that is combustible. If a review of the customers MSDS indicate the usage of this solution we will advise the customer to use other permitted facilities for its disposal.



The water separator unit is equipped with an internal pump which will be activated when demanding solutions. The solution from each of the holding tanks (No. 6 & 11) are processed separately by the Technotreat unit to prevent the chemical reaction which may result into a gas and odor discharge.

The waste water separator unit will separate the sludge waste from the water portion (Apx. 85%) by using condensation. The water is turned into a distilled water which will be collected into the 1000 gallon capacity holding tank No. 8. The sludge waste is transferred into the lined drums. Both the distilled water and the sludge waste will be tested by an outside laboratory to determine their characteristic waste code so they can be disposed properly to an offsite facility.

Please note that our automated system will be equipped with valves to be used for system shut off during an emergency. Location of these valves are shown on the attached floor plan.

7. Please refer to the attached MSDS provided by the generators which lists the components of these solutions. These components are not listed as hazardous according to subparts C and D of section 261 of 40 CFR. Please keep in mind that when we generate our first sludge waste from the developer solutions we will test the waste to determine its characteristics. At that point we can better determine whether the constituent are listed or not listed RCRA.

8. An application for EPA number has already been submitted to the EPA.

9. The Technotreat equipment will be condensed as shown on the attached document. There will be no vapor vented into the atmosphere.

10. The final distilled water (after verification by testing) will be hauled by a licensed waste water transporter to the approved waste water treatment facility. Each shipment will be documented using the non-hazardous manifest system forms. Because our application to start the business is pending with the DER and the county we do not currently have a formal agreement with a POTW. We will have a formal agreement when the business starts.

11. We anticipate 55 gallons of waste to be generated for the first 6 months of the operation. However this quantity may change as explained earlier. This waste will be tested to determine its characteristic as a hazardous or non-hazardous waste and will be disposed off accordingly.

12. We are aware of the insurance concerns regarding the operation. We will submit the proof of insurance along with our application for status change when the operation advances.

13. Please see the revised Floor Plan.

In conclusion we would like to thank you for your cooperation in this matter and remind you that as it was explained in our previous correspondence we will have a meeting with the county board of adjustment on the 27th of January.

During our initial meeting with the county land management we were told that if the DER has no opposition to our operation there will be no opposition from the county.

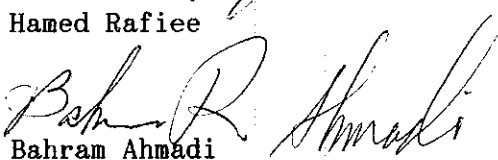
Please review these responses and if they are satisfactory to you draft a letter indicating your recommendations to the county regarding our operation. We will be contacting you on thursday January 23rd to be able to respond to your other requests, if any. In the mean time please feel free to contact us at the following numbers if you have any questions:

Hamed Rafiee: (407) 482-6893 (Home)
(305) 946-9933 (Work)

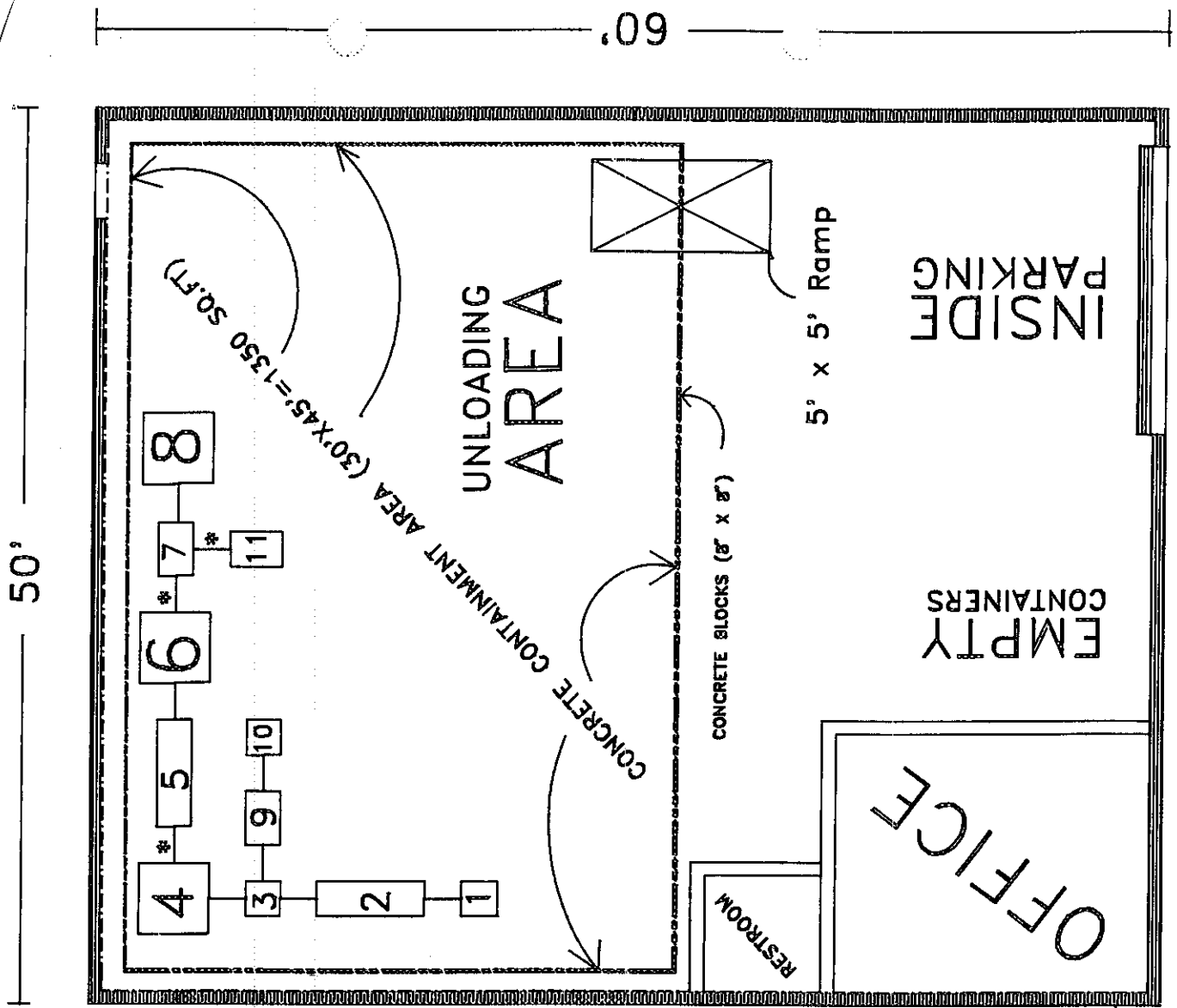
Bahram Ahmadi: (305) 781-9390 (Home)

Sincerely Yours,


Hamed Rafiee


Bahram Ahmadi

FLOOR PLAN

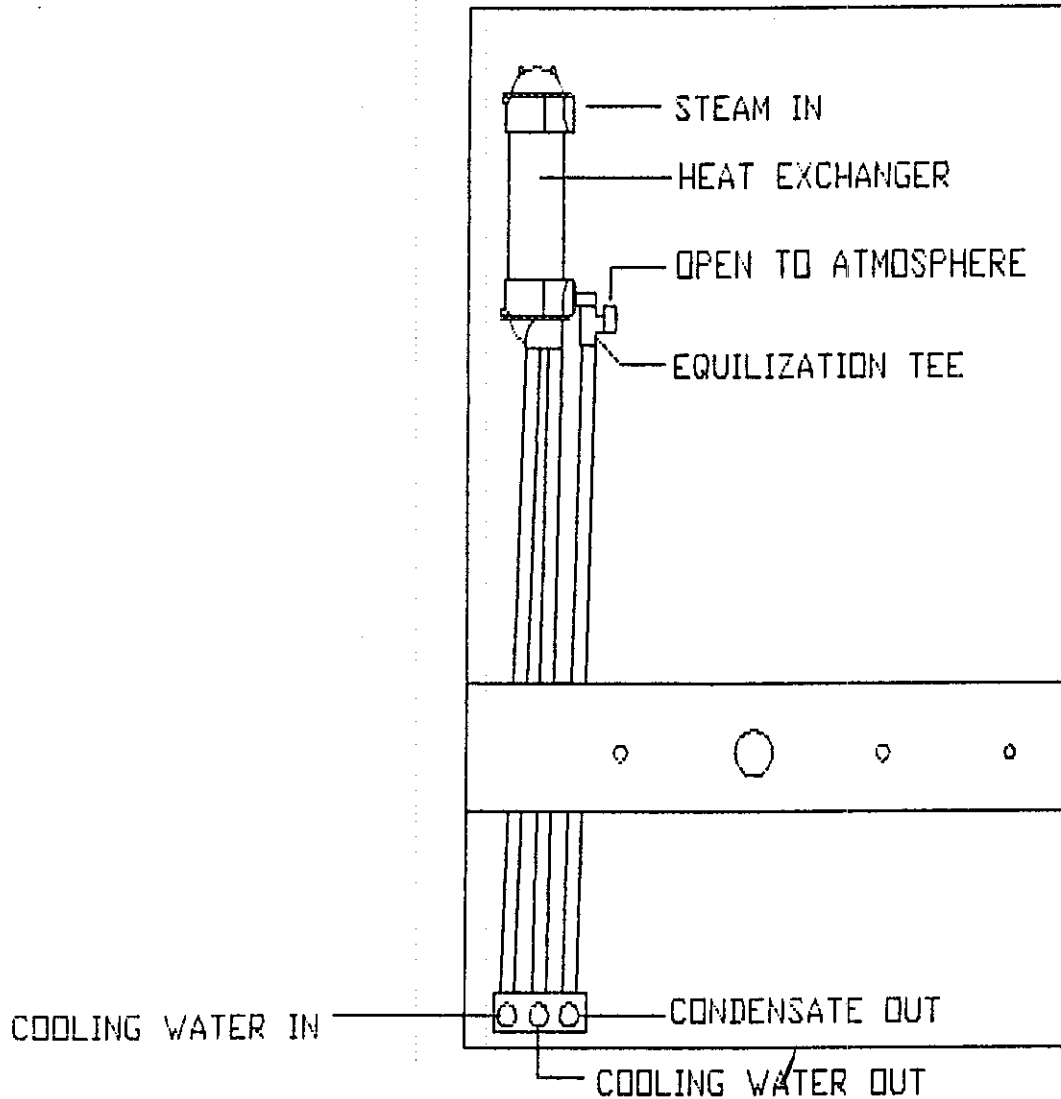


KEY

- 1) Holding tank for incoming Fixer Solution 500 Gall.
- 2) Silver Recovery Units
- 3) Pumping Station (150 Gall)
- 4) Elevated Tank 3000 Gall
- 5) Ion Exchange Units
- 6) Holding Tank 300 Gall
- 7) Waste Water Separator Unit
- 8) Holding Tank for Distilled Water 10000 Gall
- 9) Silver Recovery Units
- 10) Holding Tank for Incoming Bleach Fix Solution 500 Gall
- 11) Holding Tank for Incoming Developer Solution 3000 Gall
- *) Emergency valve

16' X 14' OH. DR.

CONDENSER OPERATION



Steam produced in the T6000 is piped to a water cooled heat exchanger where it is condensed. Condensate exits the exchanger on the lower shell side where it is piped to the manifold plate at the lower left hand corner of the unit. The condensate line has an equalization tee to eliminate any back pressure within the steam/condenser line. A portion of this tee is open to atmosphere, therefore allowing a maximum of 2' head when condensate is running out of the line.

AGENDA
SEMINOLE COUNTY BOARD OF ADJUSTMENT

TO WHOM IT MAY CONCERN:

NOTICE IS HEREBY GIVEN THAT the Seminole County Board of Adjustment will conduct a public hearing to consider the following:

CONSENT AGENDA

A. VARIANCES

1. LEONARD & PHYLLIS PAGLIARO - BA92-1-4V - Planned Unit Development Zone - Rear yard setback variance from 15 ft. to 11.2 ft. for a proposed screen room on lot 49, Aloma Bend, Tract IV, PB 42, Pg 49-53, Section 31-21-31; S side of Aloma Bend Lane, 100 ft. E of Dean Road, and 1/4 mile S of SR-426. (DIST 1)
2. CLYDE WHITE - BA92-1-1V - R-1 Residential Zone - Side yard setback variance on west lot line from 10 ft. to 18 in. for a utility shed and second shed from 10 ft. to 2 ft. and side yard setback variance on east lot line from 10 ft. to 2 ft. for a utility shed on lot 6, Block C, Little Mekiva Estates No. 1, PB 9, Pg 52, Section 9-21-29; N side of Richbee Drive and 400 ft. E of SR-434. (DIST 3)

B. MOBILE HOME/A-1 AGRICULTURE ZONE

1. MICHAEL SHOWERS - BA92-1-7TE - To place a mobile home (Renewal) on Lot B-14 (Tax Parcel 77), Lake Harney Estates, Section 10-20-32; E side of Bee Lane and 1/2 mile S of East Osceola Road. (DIST 5)

2. ROBERT & FLORA HENDRICKSON - BA92-1-2TE - To place a mobile home (Reinstatement) on Tax Parcel 6, Section 29-20-33; N side of Prevatt Road and 3/8 mile N of SR-46. (DIST 5)

3. ROBERT & FLORA HENDRICKSON - BA92-1-6TE - To place a mobile home (Reinstatement) on Tax Parcel 6A, Section 29-20-33; N side of Prevatt Road and 3/8 mile N of SR-46. (DIST 5)

4. JAMES & REGINA KINCAID - BA92-1-5TE - To place a mobile home on the N 106 ft. of the S 271 ft. of Lot 5, Block B, Brown's Subdivision of Beck Hammock, PB 1, Pg 83, Section 3-20-31; E side of Richmond Avenue and 500 ft. S of SR-46. (DIST 5)

5. M. LOUISE LEWIS - BA92-1-3TE - To place a mobile home on Lot 22, (Tax Parcel 1K), Osceola Acres, Section 9-20-32; S side of Shawnee Trail and 1/4 mile W of Osceola Road. (DIST 5)

REGULAR AGENDA

A. VARIANCES

1. KEN & GLENDA MEEKINS - BA92-1-3V - Planned Unit Development Zone - Side street setback variance from 20 ft. to 8 ft. for a wooden fence on Lot 2, Block E, Sterling Park, Unit 3, PB 18, Pg 52-54, Section 15-21-30; NE corner of Sandpiper Drive and Redwing Way and 1-1/4 mile N of Redbug Lake Road. (DIST 1)
2. CARLOS M. RIOS - BA92-1-2V - R-1A Residential Zone - Side yard setback variance from 10 ft. to 2 ft. 3-1/2 in. and front yard setback variance to allow the shed to project beyond the main building line on lot 1, Block 13, Eastbrook Subdivision, Unit 5, PB 12, Pg 80 & 81, Section 34-21-30; NW corner of Chilean and Bouganvillea Drive, 550 ft. W of Eastbrook Boulevard and 3/4 mile S of Howell Branch Road. (DIST 1)

B. MOBILE HOME/A-1 AGRICULTURE ZONE

1. ROBERT & KATHLEEN JOHNSON - BA92-1-4TE - To place a mobile home on the E 185.71 ft. of the W 3544 ft. of that part of Section 30-20-33 lying S of SR-46 less the S 30 ft. thereof; S side of SR-46 and N of Titusville Road and 1-1/2 mile E of Jungle Road. (DIST 5)
2. PAUL D. BEHRENDSE - BA92-1-1TE - To place a mobile home (Renewal) on Lot 3, Block C, Browns Subdivision of Beck Hammock, PB 1, Pg 83, Section 3-20-31; S side of Jordan Road, 600 ft. W of Richmond Avenue and 1/4 mile S of SR-46. (DIST 5)

C. SPECIAL EXCEPTIONS/OTHER

1. WAL-MART STORES, INC. d/b/a SAM'S CLUB #8214 - BA92-1-2SE - C-2 Commercial Zone - Request a Special Exception to allow the sale of alcoholic beverages for off-premise consumption on Tax Parcel 25W, 25T and 25G, Section 17-21-30; NW corner of SR-436 and Fernwood Boulevard. (DIST 4)
2. ELDER HENRY BRADLEY, SR. - BA92-1-1SE - R-1 Residential Zone - Request a Special Exception to permit off-street parking for an existing church on Lot 5 and 1/2 of vacated alley on east, Block 3, Lockhart's Subdivision, PB 3, Pg 70, Section 35-19-30; E side of Blackston Avenue, 360 ft. N of Huey Street and 1/4 mile E of Airport Boulevard. (DIST 5)

MATERIAL SAFETY DATA SHEET
EASTMAN KODAK COMPANY

Date of Preparation: 5/10/91

Kodak Accession Number: 448589

PRODUCT INFORMATION

Product Name: KODAK RP X-OMAT Developer and Replenisher, Part A

Formula: Aqueous Mixture

Kodak Catalog Number(s): CAT 124 9259 - To Make 10 Gallons; CAT 171 6828 - To Make 20 Gallons; CAT 131 8989 - To Make 200 Gallons; CAT 138 2845 - To Make 4 Gallons

Solution Number: 5468

Kodak Hazard Rating Codes: R: 1 S: 2 F: 1 C: 0

Manufacturer/Supplier:

Eastman Kodak Company
343 State Street
Rochester, New York 14650
USA

For Emergency Information: (716) 722-5151

For other purposes, call the Marketing and Distribution Center in your area.

COMPONENT INFORMATION

	Weight Percent	CAS Number	Accession Number
Water	60-65	7732-18-5	035290
Potassium sulfite	20-25	10117-38-1	907064
*Hydroquinone**	7	123-31-9	900356
*Potassium hydroxide	1-5	1310-58-3	901383
Diethylene glycol	1-5	111-46-6	902041
Sodium carbonate	1-5	497-19-8	900860
Sodium sulfite	1-5	7757-83-7	901148

*Principal Hazardous Component(s)

**Chemical subject to the reporting requirements of Section 313 of Title III of the Superfund Amendments and Reauthorization Act of 1986 & 40 CFR Part 372.

PHYSICAL DATA

Appearance and Odor: Clear, light yellow liquid; slight odor

Boiling Point: GT 100 C (GT 212 F)

Vapor Pressure: ca. 18 mmHg @ 20 C

Evaporation Rate (n-butyl acetate = 1): Not Available

Vapor Density (Air = 1): ca. 0.6

Volatile Fraction by Weight: ca. 64 %

Specific Gravity (Water = 1): 1.317

pH: 11.4

Solubility in Water (by Weight): Complete

GT = Greater than; LT = Less than

C-0131.400G
89-0061

E000271-2-07-08

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FIRE AND EXPLOSION HAZARD

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FLASH POINT: None

EXTINGUISHING MEDIA: Water spray; Dry chemical; Carbon dioxide; 'Alcohol' foam

SPECIAL FIRE FIGHTING PROCEDURES: Wear self-contained breathing apparatus and protective clothing.

UNUSUAL FIRE AND EXPLOSION HAZARDS: Fire or excessive heat may cause production of hazardous decomposition products.

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REACTIVITY DATA

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STABILITY: Stable

INCOMPATIBILITY: Strong oxidizers, Strong acids

HAZARDOUS DECOMPOSITION PRODUCTS: Combustion will produce carbon dioxide and probably carbon monoxide. Oxides of sulfur may also be present.

CONDITIONS CONTRIBUTING TO HAZARDOUS POLYMERIZATION: Will not occur.

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TOXICOLOGICAL PROPERTIES

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EXPOSURE LIMITS:

Component: Hydroquinone

ACGIH TLV: 2 mg/m³-TWA (ACGIH 1990-91)

OSHA PEL: 2 mg/m³-TWA

Component: Potassium hydroxide

ACGIH TLV: 2 mg/m³-ceiling (ACGIH 1990-91)

OSHA PEL: 2 mg/m³-ceiling

EXPOSURE EFFECTS:

Inhalation: Low hazard for recommended handling.

Eyes: Causes irritation.

Skin: Causes skin irritation. May cause an allergic skin reaction.

Ingestion: HARMFUL IF SWALLOWED. May cause irritation of the gastrointestinal tract.

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PROTECTION AND PREVENTIVE MEASURES

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VENTILATION: Good ventilation* should be sufficient. Supplementary ventilation or respiratory protection may be needed in special circumstances.

*Typically, 10 room volumes per hour is considered good general ventilation: ventilation rates should be matched to conditions of use.

SKIN AND EYE PROTECTION: Safety glasses with side shields are recommended. Impervious gloves should be worn. The routine use of a non-alkaline (acid) type of skin cleaner and regular cleaning of working surfaces, gloves, etc, will help minimize the possibility of allergic skin reaction.

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STORAGE AND DISPOSAL

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SPECIAL STORAGE AND HANDLING PRECAUTIONS: Keep from contact with oxidizing materials. Keep container tightly closed and away from acids.

SPILL, LEAK, AND DISPOSAL PROCEDURES: Flush material to an acid-free sewer with large amounts of water. Discharge, treatment, or disposal may be subject to federal, state, or local laws.

=====

FIRST AID

=====

Inhalation: If symptomatic, remove to fresh air. Get medical attention if symptoms persist.

Eyes: Immediately flush eyes with plenty of water for at least 15 minutes and get medical attention.

Skin: Flush skin with plenty of water and wash with a non-alkaline (acid) type of skin cleaner. If skin irritation or an allergic skin reaction develops, get medical attention. Remove contaminated clothing and shoes. Wash contaminated clothing before reuse. Destroy or thoroughly clean contaminated shoes.

Ingestion: If swallowed, induce vomiting immediately as directed by medical personnel. Never give anything by mouth to an unconscious person.

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ENVIRONMENTAL EFFECTS DATA

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This environmental effects summary is written to assist in addressing emergencies created by an accidental spill, which might occur during the shipment of this product, and in general, it is not meant to address discharges to sanitary sewers or publically owned treatment works.

Some laboratory test data and published data are available for the major components of this formulation. Although this product, as such, has not been tested for environmental effects, the data, mentioned above, have been used to provide the following estimates of potential environmental impact, in the event of an accidental spill: (1-12)

This chemical formulation is a strongly alkaline aqueous solution, and this property may cause adverse environmental effects. It is expected to have a moderate biological oxygen demand, and may cause oxygen depletion in aquatic systems. It is expected to have a high potential to affect aquatic organisms and a moderate potential to affect secondary waste treatment microorganisms and the germination and growth of some plants. The organic components of this chemical formulation are biodegradable and are not expected to persist in the environment. They are not likely to bioconcentrate. The direct instantaneous discharge to a receiving body of water of an amount of this formulation which will rapidly produce, by dilution, a final concentration of 0.05 mg/L, or less, is not expected to cause an adverse environmental effect. After dilution with a large amount of water, followed by secondary waste treatment, the chemicals in this formulation are not expected to have any adverse environmental impact.

C-0131.400G
89-0061

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TRANSPORTATION

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For Transportation information regarding this product, please phone the Eastman Kodak Distribution Center nearest you: Rochester, NY (716) 588-3536 or 588-3573 or 588-3505; Oak Brook, IL (312) 954-6000; Chamblee, GA (404) 455-0123; Dallas, TX (214) 241-1611; Whittier, CA (213) 945-1255; Honolulu, HI (808) 833-1661.

=====

REFERENCES

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1. Unpublished data, Health and Environment Laboratories, Eastman Kodak Company, Rochester, NY.
 2. Verschueren, K., Handbook of Environmental Data on Organic Chemicals, Second Edition, Van Nostrand Reinhold Company, New York, NY, 1983.
 3. Battelle's Columbus Laboratories, Water Quality Criteria Data Book - Vol. 3 - Effects of Chemicals on Aquatic Life - Selected Data from the Literature Through 1968, for the U.S. Environmental Protection Agency, Project No. 18050 GWV, Contract No. 68-01-0007, May 1971.
 4. National Association of Photographic Manufacturers, Inc. and Hydroscience, Inc., Environmental Effects of Photoprocessing Chemicals, National Association of Photographic Manufacturers, Harrison, NY, 1974, 2 Vols.
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 11. DeGraeve, G.M., et al., Arch. Environ. Contam. Toxicol., 9, 557-68 (1980).
 12. Pomona College, Medicinal Chemistry Project, Chemical Parameter Data Base, Leo, A.J. and Hansch, C., Eds., Seaver Chemistry Laboratory, Claremont, CA, June 20, 1987.
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PREPARATION INFORMATION

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Health and Environment Laboratories
 Eastman Kodak Company
 Rochester, New York 14650

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The information contained herein is furnished without warranty of any kind. Users should consider these data only as a supplement to other information gathered by them and must make independent determinations of the suitability and completeness of information from all sources to assure proper use and disposal of these materials and the safety and health of employees and customers.

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C-0131.400G
 89-0061

MATERIAL SAFETY DATA SHEET
EASTMAN KODAK COMPANY

Date of Revision: 05/14/91

Kodak Accession Number: 440512

PRODUCT INFORMATION

Product Name: KODAK RP X-OMAT Developer Replenisher, Part B

Formula: Aqueous Mixture

Product Use: Photographic processing chemicals for black and white film

Kodak Catalog Number(s): CAT 124 9259 - To Make 10 Gallons; CAT 171 6828 -

To Make 20 Gallons; CAT 162 0509 - To Make 200 Gallons; CAT 831 7018

Solution Number: 5228

Kodak's Internal Hazard Rating Codes: R: 2 S: 3 F: 2 C: 0

Manufacturer/Supplier:

Eastman Kodak Company

343 State Street

Rochester, New York 14650

USA

For Emergency Information: (716) 722-5151

For other purposes, call the Marketing and Distribution Center in your area.

COMPONENT INFORMATION

	Weight Percent	CAS Number	Accession Number
*Acetic acid	75-80	64-19-7	900763
1-Phenyl-3-pyrozolidinone	10-15	92-43-3	902672
Water	5-10	7732-18-5	035290

*Principal Hazardous Component(s)

PHYSICAL DATA

Appearance and Odor: Clear orange solution; pungent acetic acid odor

Boiling Point: Not Available

Vapor Pressure: 13.4 mmHg @ 20 C

Evaporation Rate (n-butyl acetate = 1): Not Available

Vapor Density (Air = 1): 1.66

Volatile Fraction by Weight: ca. 90 %

Specific Gravity (H2O = 1): 1.085

pH: LT 1.0

Solubility in Water (by Weight): Complete

GT = Greater than; LT = Less than

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85-0105

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FIRE AND EXPLOSION HAZARD

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FLASH POINT: 51 C (123 F) Setflash closed cup

EXTINGUISHING MEDIA: Water spray; Dry chemical; Carbon dioxide; "Alcohol" foam.

SPECIAL FIRE FIGHTING PROCEDURES: Wear self-contained breathing apparatus and protective clothing. Use water spray to keep fire exposed containers cool.

UNUSUAL FIRE AND EXPLOSION HAZARDS: Fire or excessive heat may cause the production of hazardous decomposition products.

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REACTIVITY DATA

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STABILITY: Stable

INCOMPATIBILITY: Strong oxidizers, Strong alkali

HAZARDOUS DECOMPOSITION PRODUCTS: Combustion will produce carbon dioxide and probably carbon monoxide.

HAZARDOUS POLYMERIZATION: Will not occur.

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TOXICOLOGICAL PROPERTIES

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EXPOSURE LIMITS:

Component: Acetic acid

ACGIH Threshold Limit Value (TLV): 10 ppm (ACGIH 1990-91)

OSHA Permissible Exposure Limit (PEL): 10 ppm

EXPOSURE EFFECTS:

Inhalation: Vapor extremely irritating to respiratory tract.

Eyes: Liquid causes severe burns. Acetic acid vapor can cause eye irritation.

Skin: Causes severe burns.

Ingestion: HARMFUL IF SWALLOWED. May cause burns or severe irritation of the gastrointestinal tract.

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PREVENTIVE MEASURES

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VENTILATION: Good general ventilation* should be used. Local exhaust ventilation or an enclosed handling system may be needed to control air contamination.

*Typically 10 room volumes per hour is considered good general ventilation: Ventilation rates should be matched to conditions of use.

RESPIRATORY PROTECTION: A NIOSH-approved organic vapor respirator should be worn if needed. If respirators are used, a program should be instituted to assure compliance with OSHA standard 29CFR 1910.134.

SKIN AND EYE PROTECTION: Safety goggles or a face shield should be worn. Impervious gloves and clothing should be worn.

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STORAGE AND DISPOSAL

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SPECIAL STORAGE AND HANDLING PRECAUTIONS: Material is classified as a combustible liquid. Keep away from heat and flame. Keep from contact with oxidizing materials. Keep container tightly closed and away from alkali.

SPILL, LEAK, AND DISPOSAL PROCEDURES: Remove all sources of ignition. Small Amounts - neutralize with baking soda (sodium bicarbonate) and flush material to sewer with large amounts of water. Large Amounts - absorb material in vermiculite or other suitable absorbent and place in impervious container. Dispose in an approved incinerator or contract with licensed chemical waste disposal agency. Discharge, treatment, or disposal may be subject to federal, provincial, or municipal laws.

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FIRST AID

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Inhalation: Remove to fresh air. Treat symptomatically. Get medical attention if symptoms occur.

Eyes: Immediately flush eyes with plenty of water for at least 15 minutes and get prompt medical attention.

Skin: Immediately flush with plenty of water for at least 15 minutes while removing contaminated clothing and shoes. Get prompt medical attention. Wash contaminated clothing before reuse. Destroy or thoroughly clean contaminated shoes.

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ENVIRONMENTAL EFFECTS DATA

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This environmental effects summary is written to assist in addressing emergencies created by an accidental spill, which might occur during the shipment of this product, and in general, it is not meant to address discharges to sanitary sewers or publically owned treatment works.

Some laboratory test data and published data are available for the major components of this formulation. Although this product, as such, has not been tested for environmental effects, the data, mentioned above, have been used to provide the following estimates of potential environmental impact, in the event of an accidental spill: (1-9)

This chemical formulation is a strongly acidic aqueous solution, and this property may cause adverse environmental effects. It is expected to have a high biological oxygen demand, and it may cause oxygen depletion in aquatic systems. It is expected to have a high potential to affect aquatic organisms and secondary waste treatment microorganisms. It is expected to have a moderate potential to affect the germination and growth of some plants. The components of this chemical formulation are biodegradable and are not expected to persist in the environment.

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They are not likely to bioconcentrate. The direct instantaneous discharge to a receiving body of water of an amount of this solution which will rapidly produce, by dilution, a final concentration of 0.6 mg/L or less is not expected to cause an adverse environmental effect. After dilution with a large amount of water, followed by secondary waste treatment, the chemicals in this formulation are not expected to have any adverse environmental impact.

TRANSPORTATION

For transportation information regarding this product, please phone the Eastman Kodak Distribution Center nearest you: Rochester, NY (716) 588-3536 or 588-3573 or 588-3505; Oak Brook, IL (312) 954-6000; Chamblee, GA (404) 455-0123; Dallas, TX (214) 241-1611; Whittier, CA (213) 945-1255; Honolulu, HI (808) 833-1661.

REFERENCES

1. Unpublished data, Health and Environment Laboratories, Eastman Kodak Company, Rochester, NY.
2. Verschueren, K., Handbook of Environmental Data on Organic Chemicals, Second Edition, Van Nostrand Reinhold Company, New York, N.Y., 1983.
3. Battelle's Columbus Laboratories, Water Quality Criteria Data Book - Vol. 3 - Effects of Chemicals on Aquatic Life - Selected Data from the Literature Through 1968, for the U.S. Environmental Protection Agency, Project No. 18050 GWV, Contract No. 68-01-0007, May 1971.
4. National Association of Photographic Manufacturers, Inc. and Hydroscience, Inc., Environmental Effects of Photoprocessing Chemicals, National Association of Photographic Manufacturers, Harrison, New York, 1974, 2 Vols.
5. Kodak Publication J-41, BOD5 and COD of Photographic Chemicals, Eastman Kodak Co., 1981.
6. McKee, J.E. and Wolf, H.W., Eds., Water Quality Criteria, State of California, Publication No. 3-A, 1963.
7. Bringmann, G. and Kuehn, R., Results of Toxic Action of Water Pollutants on *Daphnia magna* (Straus) Tested by an Improved Standardized Procedure, Z. Wasser Abwasser Forsch., 15(1), 1-6 (1982) (in German).
8. Juhnke, I. and Luedemann, D., Results of the Study of 200 Chemical Compounds on Acute Fish Toxicity Using the Golden Orfe Test, Z. Wasser Abwasser Forsch., 11(5), 161-4 (1978) (in German).
9. Pomona College, Medicinal Chemistry Project, Chemical Parameter Data Base, Leo, A.J. and Hansch, C., Eds., Seaver Chemistry Laboratory, Claremont, California, June 21, 1985.

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85-0105

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PREPARATION INFORMATION

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**Health and Environment Laboratories
Eastman Kodak Company
Rochester, New York 14652-3615**

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The information contained herein is furnished without warranty of any kind. Users should consider these data only as a supplement to other information gathered by them and must make independent determinations of the suitability and completeness of information from all sources to assure proper use and disposal of these materials and the safety and health of employees and customers.

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E000271-2-03-08

MATERIAL SAFETY DATA SHEET
EASTMAN KODAK COMPANY

Date of Revision: 05/06/91

Kodak Accession Number: 440513

PRODUCT INFORMATION

Product Name: KODAK RP X-OMAT Developer Replenisher, Part C

Formula: Aqueous Mixture

Product Use: Photographic processing chemicals for black & white film

Kodak Catalog Number(s): CAT 124 9259 - To Make 10 Gallons; CAT 171 6828 -
To Make 20 Gallons; CAT 162 0509 - To Make 200 Gallons; CAT 841 4161

Solution Number: 5250

Kodak's Internal Hazard Rating Codes: R: 2 S: 3 F: 1 C: 0

Manufacturer/Supplier:

Eastman Kodak Company
343 State Street
Rochester, New York 14650
USA

For Emergency Information: (716) 722-5151

For other purposes, call the Marketing and Distribution Center in your area.

COMPONENT INFORMATION

	Weight Percent	CAS Number	Accession Number
Water	40-45	7732-18-5	035290
*Glutaraldehyde	40-45	111-30-8	908648
Acetic acid	5-10	64-19-7	900763
5-Nitroindazole	1-5	5401-94-5	904489

*Principal Hazardous Component(s)

PHYSICAL DATA

Appearance and Odor: Yellow-green to orange colored solution; aldehyde odor

Boiling Point: GT 100 C (GT 212 F)

Vapor Pressure: ca. 18 mmHg @ 20 C

Evaporation Rate (n-butyl acetate = 1): Not Available

Vapor Density (Air = 1): ca. 1.8

Volatile Fraction by Weight: GT 95 %

Specific Gravity (H2O = 1): 1.127

pH: ca. 2.7

Solubility in Water (by Weight): Complete

GT = Greater than; LT = Less than

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85-0106

E000271-2-02-06

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FIRE AND EXPLOSION HAZARD DATA

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FLASH POINT: None
EXTINGUISHING MEDIA: Water spray; Dry chemical; Carbon dioxide
SPECIAL FIRE FIGHTING PROCEDURES: Wear self-contained breathing apparatus and protective clothing.
UNUSUAL FIRE AND EXPLOSION HAZARDS: None

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REACTIVITY DATA

=====

STABILITY: Stable
INCOMPATIBILITY: Strong oxidizers, strong alkali
HAZARDOUS DECOMPOSITION PRODUCTS: Combustion will produce carbon dioxide and probably carbon monoxide.
HAZARDOUS POLYMERIZATION: Will not occur.

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TOXICOLOGICAL PROPERTIES

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EXPOSURE LIMITS:
Component: Acetic acid
ACGIH Threshold Limit Value (TLV): 10 ppm-TWA, (ACGIH 1990-91)
OSHA Permissible Exposure Limit (PEL): 10 ppm-TWA

Component: Glutaraldehyde
ACGIH Threshold Limit Value (TLV): 0.2 ppm-TWA, Ceiling, (ACGIH 1990-91)
OSHA Permissible Exposure Limit (PEL): 0.2 ppm-TWA, Ceiling

EXPOSURE EFFECTS:
Inhalation: Harmful if inhaled. Vapor extremely irritating to respiratory tract.

Eyes: Liquid causes severe burns. Vapor causes irritation.

Skin: Causes severe burns. May cause allergic skin reaction.

Ingestion: HARMFUL IF SWALLOWED. May cause burns or severe irritation of the gastrointestinal tract.

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PREVENTIVE MEASURES

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VENTILATION: Good general ventilation* should be used. Local exhaust ventilation or an enclosed handling system may be needed to control air contamination.

*Typically 10 room volumes per hour is considered good general ventilation: Ventilation rates should be matched to conditions of use.

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85-0106

RESPIRATORY PROTECTION: A NIOSH-approved organic vapor respirator should be worn if needed. If respirators are used, a program should be instituted to assure compliance with OSHA standard 29CFR 1910.134.

SKIN AND EYE PROTECTION: Safety glasses goggles or faceshield should be worn. Impervious gloves and clothing should be worn.

=====
STORAGE AND DISPOSAL
=====

SPECIAL STORAGE AND HANDLING PRECAUTIONS: Keep container tightly closed and away from alkali. Keep from contact with oxidizing materials.

SPILL, LEAK, AND DISPOSAL PROCEDURES: Flush material to sewer with large amounts of water. Discharge, treatment, or disposal may be subject to federal, provincial, or municipal laws.

=====
FIRST AID
=====

Inhalation: Remove to fresh air. Treat symptomatically. Get medical attention if symptoms persist.

Eyes: Immediately flush eyes with plenty of water for at least 15 minutes and get prompt medical attention.

Skin: Immediately flush with plenty of water for at least 15 minutes while removing contaminated clothing and shoes. Get prompt medical attention. Wash contaminated clothing before reuse. Destroy or thoroughly clean contaminated shoes. If an allergic skin reaction develops, get medical attention.

=====
ENVIRONMENTAL EFFECTS DATA
=====

This environmental effects summary is written to assist in addressing emergencies created by an accidental spill, which might occur during the shipment of this product, and in general, it is not meant to address discharges to sanitary sewers or publically owned treatment works.

Some laboratory test data and published data are available for the major components of this formulation. Although this product, as such, has not been tested for environmental effects, the data, mentioned above, have been used to provide the following estimates of potential environmental impact, in the event of an accidental spill.

This chemical formulation is a strongly acidic aqueous solution, and this property may cause adverse environmental effects if discharged directly to the environment without treatment. This chemical formulation has not been tested for environmental effects.

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E000271-2-01-08

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TRANSPORTATION

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For Transportation information regarding this product, please phone the Eastman Kodak Distribution Center nearest you: Rochester, NY (716) 588-3536 or 588-3573 or 588-3505; Oak Brook, IL (312) 954-6000; Chamblee, GA (404) 455-0123; Dallas, TX (214) 241-1611; Whittier, CA (213) 945-1255; Honolulu, HI (808) 833-1661.

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PREPARATION INFORMATION

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Health and Environment Laboratories
Eastman Kodak Company
Rochester, New York 14652-3615

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C-0132.010D
85-0106

Material Safety Data Sheet



CRONEX High Stability Developer / Replenisher Part C

LITERATURE INFORMATION

MSDS Number H - 15826 (8/89)
(VAX P0000020)

MATERIAL IDENTIFICATION

Product Name CRONEX[®] High Stability
Developer / Replenisher - Part C

Chemical Family Aqueous, aldehyde solution with
bisulfite adduct

Tradenames & Synonyms HSD - C

DuPont Registry Number DP415 - 08 - 1

Manufacturer/Distributor E. I. du Pont de Nemours and Company
1007 Market Street,
Wilmington, DE 19898

General Product Information (800) 441 - 7515

Transportation Emergency Phone (800) 424 - 9300 (CHEMTREC)

Medical Emergency Phone (800) 441 - 3637

COMPONENTS

Material	CAS Number	Per Cent By Weight
Glutaraldehyde-Bis-Potassium Bisulfite	68310 - 08 - 7	10 - 30
Glutaraldehyde	111 - 30 - 8	5 - 10
Water	7732 - 18 - 5	60 - 100

PHYSICAL DATA

Specific Gravity	1.08
Solubility in Water	100 WT%
pH	5.3
Boiling Point	118° C (244°F)
Odor	Pungent.
Form	Clear Liquid.
Color	Colorless.

HAZARDOUS REACTIVITY

Instability	Stable.
Incompatibility	None reasonably foreseen.
Decomposition	Hazardous decomposition will not occur.
Polymerization	Polymerization will not occur.

FIRE & EXPLOSION

Data	Flash Point: None.
Hazards	None.
Extinguishing Media	Any applicable to primary cause of fire.
Special Fire Fighting Instructions	Evacuate personnel to a safe area. Keep personnel removed and upwind of fire. Wear self-contained breathing apparatus.

HEALTH HAZARD INFORMATION

This product can be used safely when applicable precautions are followed.

Causes eye and skin irritation. Inhalation causes respiratory irritation. Inhalation, ingestion or skin absorption can result in systemic poisoning resulting in central nervous system disturbance.

TOXICITY DATA

Glutaraldehyde

Slightly toxic by inhalation.
ALC (4 - hour): 5000 ppm in rats.Moderately toxic by contact.
Dermal LD50: 2719 mg/kg in rabbits.Moderately toxic by ingestion.
Oral LD50: 233 mg/kg in rats.

**SYMPTOMS OF
OVEREXPOSURE**Eye Irritation
Respiratory Irritation
Dermatitis
Nausea
Headache
Drowsiness
Skin sensitizationSkin Irritation
Mucous Membrane Irritation
Coughing
Dizziness
Difficulty Breathing
Abdominal Pain

CARCINOGENICITY

None of the components in this product is listed by IARC, NTP, OSHA or ACGIH as a carcinogen.

SAFETY PRECAUTIONS

Avoid breathing vapors or mist. Avoid contact with eyes. Avoid contact with skin. Avoid contact with clothing. Wash thoroughly after handling.

EXPOSURE LIMITSFor CRONEX High Stability
Developer / Replenisher - Part C

ACGIH-TLV®: None established.

OSHA PEL: None established.

For Glutaraldehyde

Du Pont AEL: None established.

ACGIH TLV:

•0.2 ppm.

•0.7 mg/m³, (ceiling) 8 - hour TWA.

OSHA PEL:

•0.2 ppm.

•0.8 mg/m³ (ceiling)

("AEL" is Du Pont's Acceptable Exposure Limit. "TLV" is a registered trademark of ACGIH for its Threshold Limit Value. "PEL" is OSHA's term for Permissible Exposure Limit.)

FIRST AID

Inhalation — — Remove to fresh air. If not breathing, give artificial respiration. If breathing is difficult, give oxygen. Call a physician.

Skin Contact — — Immediately wash skin with soap and plenty of water for at least 15 minutes while removing contaminated clothing and shoes. Call a physician.

Eye Contact — — Immediately flush eyes with plenty of water for at least 15 minutes. Call a physician.

Ingestion — — If swallowed, do not induce vomiting. Give large amounts of water. Never give anything by mouth to an unconscious person.

All cases of ingestion should be referred immediately to a poison control center or a physician, and vomiting should normally be initiated only on their advice and by the means they specify.

PROTECTION INFORMATION**Generally Applicable Control Measures And Procedures**

Use only with adequate ventilation. Keep container tightly closed. Do not store or consume food, drink or tobacco in areas where they may become contaminated with this material.

Personal Protective Equipment

Eye/Face: Coverall chemical splash goggles.

Chemical cartridge respirator with organic vapor cartridges only in poorly ventilated areas.

Protective gloves: Use latex or neoprene gloves.

DISPOSAL INFORMATION

Aquatic Toxicity — — For Glutaraldehyde — 96 hour LC50: <0.5 mg/l (extremely toxic).

Spill, Leak or Release — — Review fire and explosion hazards and safety precautions before proceeding with cleanup. Use appropriate personal protective equipment during cleanup. Dike the spill. Prevent liquid from entering sewers, waterways or low areas. Soak up with sawdust, sand, oil dry or other absorbent material.

Waste Disposal — — Cleaned-up material is a RCRA hazardous waste. Treatment, storage, transportation and disposal must be in accordance with applicable Federal, State and Local regulations.

Remove nonusable solid material and / or contaminated soil for disposal in an approved and permitted landfill.

Discharge to sewer requires approval of permitting authority and may require pretreatment.

SHIPPING INFORMATION**DOT:**

Proper Shipping Name:

Corrosive liquid, NOS
(Contains Glutaraldehyde)

Hazard Class:

Corrosive Material

UN/NA Number:

UN 1760

DOT Label(s):

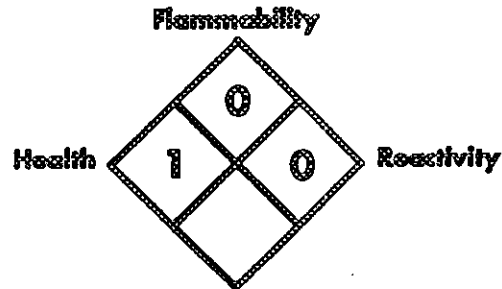
Corrosive

DOT Placard:

Corrosive

STORAGE CONDITIONS

Store in well-ventilated area. Keep container tightly closed. Do not store or consume food, drink or tobacco in area where they may become contaminated with this material.

NFPA HAZARDOUS MATERIAL IDENTIFICATION SYSTEM**DATA SHEET RESPONSIBILITY**

Responsibility for this Material Safety Data Sheet resides with:

CTC SHEA Office
Du Pont Medical Products
Chestnut Run Plaza — 708
P.O. Box 80708
Wilmington, DE 19880 - 0708
(302) 999 - 5420

For additional Material Safety Data Sheets, contact your Du Pont dealer or the Du Pont marketing service center which serves your area. Order MSDS number H - 14324 (8/89).

The data in the Material Safety Data Sheet relates only to the specific materials designated herein and does not relate to use in combination with any other material or in any process.

**CRONEX® is a
registered trademark
For Du Pont
x-ray films, screens,
chemicals and equipment.**



Medical Products

Material Safety Data Sheet



CRONEX High Stability Developer / Replenisher Part B

LITERATURE INFORMATION

MSDS Number H - 14325 (8/89)
(VAX P0000017)

MATERIAL IDENTIFICATION

Product Name CRONEX[®] High Stability
Developer / Replenisher - Part B

Chemical Family Acidic glycol-water mixture

Tradenames & Synonyms HSD - B

DuPont Registry Number DP415 - 07 - 0

Manufacturer/Distributor E. I. du Pont de Nemours and Company
1007 Market Street,
Wilmington, DE 19898

General Product Information (800) 441 - 7515

Transportation Emergency Phone (800) 424 - 9300 (CHEMTREC)

Medical Emergency Phone (800) 441 - 3637

COMPONENTS

Material	CAS Number	Per Cent By Weight
Acetic Acid	64 - 19 - 7	40 - 70
Triethylene Glycol	112 - 27 - 6	15 - 40
1-Phenyl-3-Pyrazolidone	92 - 43 - 3	5 - 10
Water	7732 - 18 - 5	10 - 30

PHYSICAL DATA

Specific Gravity	1.1
Solubility in Water	100 WT%
pH	2
Boiling Point	120° C (248° F)
Odor	Vinegar (Threshold: 0.21 ppm).
Form	Clear Liquid.
Color	Light Amber.

HAZARDOUS REACTIVITY

Instability	Stable.
Incompatibility	Incompatible with strong bases.
Decomposition	Decomposes by reaction with strong bases.
Polymerization	Polymerization will not occur.

FIRE & EXPLOSION

Data	Flammable limits in air (% by Volume): •LEL (triethylene glycol): 0.9 %. •UEL (acetic acid): 16 %. Flash Point: None.
Hazards	None.
Extinguishing Media	Any applicable to primary cause of fire.
Special Fire Fighting Instructions	Evacuate personnel to a safe area. Keep personnel removed and upwind of fire. Wear self-contained breathing apparatus. Wear full protective equipment. Cool tank/container with water spray.

HEALTH HAZARD INFORMATION

This product can be used safely when applicable precautions are followed.

Causes eye and skin burns. Inhalation can cause sever respiratory irritation and dental erosion. Ingestion causes gastrointestinal corrosion.

TOXICITY DATA

1-Phenyl-3-Pyrazolidone

Moderately toxic by ingestion.
Oral LD50: 200 mg/kg in rats.

Acetic Acid

Very low toxicity by inhalation.
LC50 (1 - hr.): 5620 ppm in mice.Moderately toxic by contact.
Dermal LD50: 1060 mg/kg in rabbits.Slightly toxic by ingestion.
Oral LD50: 3310 mg/kg in rabbits.

Triethylene Glycol

Very low toxicity by ingestion.
Oral LD50: 19 g/kg in rats.**SYMPTOMS OF OVEREXPOSURE**Eye Burns
Respiratory Irritation
Respiratory Edema
Dermatitis
NauseaSkin Burns
Mucous Membrane Irritation
Coughing
Difficulty Breathing
Abdominal Pain
Diarrhea**CARCINOGENICITY**

None of the components in this product is listed by IARC, NTP, OSHA or ACGIH as a carcinogen.

SAFETY PRECAUTIONS

Avoid breathing vapors or mist. Avoid contact with eyes. Avoid contact with skin. Avoid contact with clothing. Wash thoroughly after handling.

EXPOSURE LIMITSFor CRONEX High Stability
Developer / Replenisher - Part BACGIH TLV[®]: None established.

OSHA PEL: None established.

For Acetic Acid

Du Pont AEL:
• 10 ppm, 8 - and 12 - hour TWA.ACGIH TLV:
• 8 - hour TWA:
10 ppm or 25 mg/m³.• STEL:
15 ppm or 37 mg/m³.OSHA PEL:
• 8 - hour TWA:
10 ppm or 25 mg/m³.

For Triethylene Glycol

Du Pont AEL: 2 ppm, 8 - hour TWA.

ACGIH TLV: None established.

OSHA PEL: None established.

("AEL" is Du Pont's Acceptable Exposure Limit. "TLV" is a registered trademark of ACGIH for its Threshold Limit Value. "PEL" is OSHA's term for Permissible Exposure Limit.)

FIRST AID

Inhalation --- Remove to fresh air. If not breathing, give artificial respiration. If breathing is difficult, give oxygen. Call a physician.

Skin Contact --- Immediately wash skin with soap and plenty of water for at least 15 minutes while removing contaminated clothing and shoes. Call a physician.

Eye Contact --- Immediately flush eyes with plenty of water for at least 15 minutes. Call a physician.

Ingestion --- If swallowed, do not induce vomiting. Give large amounts of water. Never give anything by mouth to an unconscious person.

All cases of ingestion should be referred immediately to a poison control center or a physician, and vomiting should normally be initiated only on their advice and by the means they specify.

PROTECTION INFORMATION**Generally Applicable Control Measures And Procedures**

Use only with adequate ventilation. Keep container tightly closed. Do not store or consume food, drink or tobacco in areas where they may become contaminated with this material.

Personal Protective Equipment

Eye/Face: Coverall chemical splash goggles.

Chemical cartridge respirator with organic vapor cartridges only in poorly ventilated areas.

Protective gloves: Use latex or neoprene gloves.

DISPOSAL INFORMATION

Aquatic Toxicity --- For Acetic Acid --- Slightly toxic to flathead minnows. 96 hour LC50: 79 - 88 mg/l.

Spill, Leak or Release --- Review fire and explosion hazards and safety precautions before proceeding with cleanup. Use appropriate personal protective equipment during cleanup. Remove sources of heat, sparks, flame, impact, friction or electricity. Dike the spill. Prevent liquid from entering sewers, waterways or low areas. Soak up with sawdust, sand, oil dry or other absorbent material. Neutralize with sodium bicarbonate.

Waste Disposal --- Cleaned-up material is a RCRA hazardous waste. Treatment, storage, transportation and disposal must be in accordance with applicable Federal, State and Local regulations.

Recover nonusable free liquid and dispose of in an approved and permitted incinerator.

Remove nonusable solid material and / or contaminated soil for disposal in an approved and permitted landfill.

Discharge to sewer requires approval of permitting authority and may require pretreatment.

SHIPPING INFORMATION**DOT:**

Proper Shipping Name:

Acetic Acid Solution

Hazard Class:

Corrosive Material

UN/NA Number:

UN 2790

DOT Label(s):

Corrosive

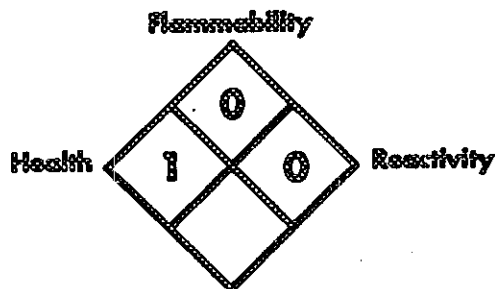
DOT Placard:

Corrosive

STORAGE CONDITIONS

Store in well-ventilated area. Store in cool place. Keep container tightly closed. Store in accordance with National Fire Protection Association regulations. Store in accordance with Federal regulations.

Do not store or consume food, drink or tobacco in area where they may become contaminated with this material.

NFPA HAZARDOUS MATERIAL IDENTIFICATION SYSTEM**DATA SHEET RESPONSIBILITY**

Responsibility for this Material Safety Data Sheet resides with:

CTC SHEA Office

Du Pont Medical Products

Chestnut Run Plaza — 708

P.O. Box 80708

Wilmington, DE 19880 - 0708

(302) 999 - 5420

For additional Material Safety Data Sheets, contact your Du Pont dealer or the Du Pont marketing service center which serves your area. Order MSDS number H - 14325 (8/89).

The data in the Material Safety Data Sheet relates only to the specific materials designated herein and does not relate to use in combination with any other material or in any process.

**CRONEX® is a
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For Du Pont
x-ray films, screens,
chemicals and equipment.**



Medical Products

Material Safety Data Sheet



CRONEX High Stability Developer / Replenisher Part A

LITERATURE INFORMATION

MSDS Number H-14324 (8/89)
(VAX P0000016)

MATERIAL IDENTIFICATION

Product Name CRONEX[®] High Stability
Developer / Replenisher - Part A

Chemical Family Aqueous, alkaline solution with sulfites

Tradenames & Synonyms HSD - A

DuPont Registry Number DP415 - 05 - 8

Manufacturer/Distributor E. I. du Pont de Nemours and Company
1007 Market Street,
Wilmington, DE 19898

General Product Information (800) 441 - 7515

Transportation Emergency Phone (800) 424 - 9300 (CHEMTREC)

Medical Emergency Phone (800) 441 - 3637

COMPONENTS

Material	CAS Number	Per Cent By Weight
Potassium Sulfite	10117 - 38 - 1	7 - 13
Hydroquinone*	123 - 31 - 9	5 - 10
Sodium Sulfite	7757 - 83 - 7	5 - 10
Potassium Carbonate	584 - 08 - 7	3 - 7
Potassium Hydroxide	1310 - 58 - 3	3 - 7
Water	7732 - 18 - 5	40 - 70

*Regulated as a toxic chemical under Section 313 of Title III of the Superfund Amendments and Reauthorization Act of 1986, and 40 CFR Part 372.

PHYSICAL DATA

Specific Gravity	1.2 — 1.3
Solubility in Water	100 WT%
pH	11 — 12
Boiling Point	110° C (230° F)
Odor	Odorless.
Form	Clear Liquid.
Color	Colorless.

HAZARDOUS REACTIVITY

Instability	Stable.
Incompatibility	Incompatible with strong acids and aluminum.
Decomposition	Decomposes by reaction with strong acids.
Polymerization	Polymerization will not occur.

FIRE & EXPLOSION

Data	Flash Point: None.
Hazards	None.
Extinguishing Media	Any applicable to primary cause of fire.
Special Fire Fighting Instructions	Evacuate personnel to a safe area. Keep personnel removed and upwind of fire. Wear self-contained breathing apparatus.

HEALTH HAZARD INFORMATION

This product can be used safely when applicable precautions are followed.

Causes eye and skin irritation. Inhalation of mist or dried residue may cause respiratory irritation. Ingestion may cause gastrointestinal irritation.

Ingestion of hydroquinone can affect the central nervous system, can cause liver disease, can damage blood and bone marrow, and contact can cause skin and eye discoloration. Persons with existing liver or bone marrow disease may be at increased risk of toxic effects. However, none of these systemic effects has been associated with use of this product.

TOXICITY DATA

Hydroquinone	Moderately toxic by ingestion. Oral LD50: 320 mg/kg in rats.
Potassium Carbonate	Slightly toxic by ingestion. Oral LD50: 1870 mg/kg in rats.
Potassium Hydroxide	Moderately toxic by ingestion. Oral LD50: 365 mg/kg in rats.
Sodium Sulfite	Slightly toxic by ingestion. Oral ALD: 2825 mg/kg in rabbits.

SYMPTOMS OF OVEREXPOSURE

Eye Irritation	Skin Irritation
Respiratory Irritation	Mucous Membrane Irritation
Dermatitis	Coughing
Nausea	Dizziness
Headache	Shortness of Breath
Weakness	Abdominal Pain
Incoordination	Diarrhea
Jaundice	Excitation
Cyanosis	Thirst
Ringling In The Ears	

CARCINOGENICITY

None of the components in this product is listed by IARC, NTP, OSHA or ACGIH as a carcinogen.

SAFETY PRECAUTIONS

Avoid breathing vapors or mist. Avoid contact with eyes. Avoid contact with skin. Avoid contact with clothing. Wash thoroughly after handling.

EXPOSURE LIMITS

For CRONEX High Stability Developer / Replenisher -- Part A	ACGIH TLV [®] : None established. OSHA PEL: None established.
For Hydroquinone	Du Pont AEL: None established. ACGIH TLV: 2 mg/m ³ , 8 - hour TWA. OSHA PEL: 2 mg/m ³ , 8 - hour TWA.
For Potassium Hydroxide	Du Pont AEL: None established. ACGIH TLV: 2 mg/m ³ , (ceiling). OSHA PEL: 2 mg/m ³ , (ceiling).

("AEL" is Du Pont's Acceptable Exposure Limit. "TLV" is a registered trademark of ACGIH for its Threshold Limit Value. "PEL" is OSHA's term for Permissible Exposure Limit.)

FIRST AID

Inhalation — — Remove to fresh air. If not breathing, give artificial respiration. If breathing is difficult, give oxygen. Call a physician.

Skin Contact — — Immediately wash skin with soap and plenty of water.

Eye Contact — — Immediately flush eyes with plenty of water for at least 15 minutes. Call a physician.

Ingestion — — If swallowed, do not induce vomiting. Give large amounts of water. Never give anything by mouth to an unconscious person.

All cases of ingestion should be referred immediately to a poison control center or a physician, and vomiting should normally be initiated only on their advice and by the means they specify.

PROTECTION INFORMATION

Generally Applicable Control Measures And Procedures

Use only with adequate ventilation. Keep container tightly closed. Do not store or consume food, drink or tobacco in areas where they may become contaminated with this material.

Personal Protective Equipment

Eye/Face: Coverall chemical splash goggles.

Protective gloves: Use latex or neoprene gloves.

DISPOSAL INFORMATION

Aquatic Toxicity — — For Hydroquinone — 96 hour LC50: <0.5 mg/l (extremely toxic).

Spill, Leak or Release — — Review fire and explosion hazards and safety precautions before proceeding with cleanup. Use appropriate personal protective equipment during cleanup. Dike the spill. Prevent liquid from entering sewers, waterways or low areas. Soak up with sawdust, sand, oil dry or other absorbent material. Neutralize with sodium bicarbonate.

Waste Disposal — — Treatment, storage, transportation and disposal must be in accordance with applicable Federal, State and local regulations. Remove nonusable solid material and/or contaminated soil for disposal in an approved and permitted landfill.

Discharge to sewer requires approval of permitting authority and may require pretreatment.

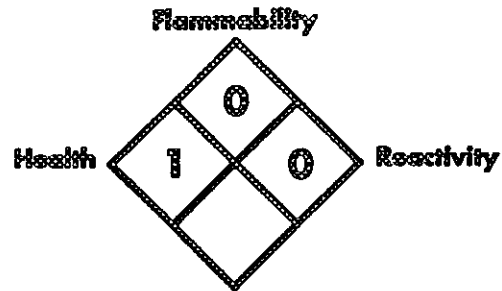
For purposes of EPA SARA Title III: Hydroquinone (RQ = 1 lb) concentration in this product (conc.): 0.485 lb/gallon.

SHIPPING INFORMATION**DOT**

Proper Shipping Name:	Potassium Hydroxide Solution
Hazard Class:	Corrosive Material
UN/NA Number:	UN 1814
DOT Label(s):	Corrosive
DOT Placard:	Corrosive

STORAGE CONDITIONS

Store in well-ventilated area. Keep container tightly closed. Do not store or consume food, drink or tobacco in area where they may become contaminated with this material.

NFPA HAZARDOUS MATERIAL IDENTIFICATION SYSTEM**DATA SHEET RESPONSIBILITY**

Responsibility for this Material Safety Data Sheet resides with:
CTC SHEA Office
Du Pont Medical Products
Chestnut Run Plaza -- 708
P.O. Box 80708
Wilmington, DE 19880 - 0708
(302) 999 - 5420

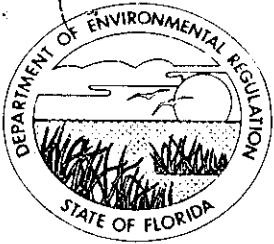
For additional Material Safety Data Sheets, contact your Du Pont dealer or the Du Pont marketing service center which serves your area. Order MSDS number H - 14324 (8/89).

The data in the Material Safety Data Sheet relates only to the specific materials designated herein and does not relate to use in combination with any other material or in any process.

CRONEX® is a
registered trademark
For Du Pont
x-ray films, screens,
chemicals and equipment.



Medical Products



Florida Department of Environmental Regulation

Central District • 3319 Maguire Boulevard, Suite 232 • Orlando, Florida 32803-3767

Lawton Chiles, Governor

Carol M. Browner, Secretary

January 15, 1992

Hamad Rafiee
9125 Tivoli Place
Boca Raton, FL 33434

OCD-HW-92-0003

Subject : Photographic Waste Control of Florida Pilot Plan

Dear Mr. Rafiee:

Ms. McGehee discussed your presentation with me and I have examined the information which you have submitted. We are very interested in the success of businesses which can reduce the amount of hazardous waste generated for disposal, provided such facilities operate within the regulatory frame work. Before we can respond to you in writing concerning the conditionally exempt small quantity generator exemption, we would need you to respond to the following concerns:

1. How would you determine that your customers are actually conditionally exempt and what documentation would you be able to provide to the Department inspectors?
2. You should be aware that the hazardous waste treatment permitting process is both lengthy and expensive. We would need more specific information concerning your timetable for offering services to conditionally exempt and later to small quantity generators.
3. Transporters of this waste should be approved hazardous waste transporters. Please explain the meaning of "CDL licensed operators with hazardous waste endorsements".
4. We are concerned by your test methods to determine when silver recovery is complete. The regulatory limit of silver is 5 milligrams per liter while the literature you provide from DuPont addresses testing by silver strips and contains the notation that "silver test paper does not consistently identify silver in concentrations below 0.5 gm/L (500 milligrams)".

H. Rafiee
OCD-HW-92-0003
January 15, 1992

5. Will your process be continuous or operate in batches? How long would you store waste solutions before they will be processed? Please provide us an estimate of your anticipated volume, including potential customers by industry so that we may better evaluate your proposal.
6. Please describe your process more precisely including capacities of the holding tanks, method of operation (batch or continuous), more information on how you will determine that processed solution following silver recovery is no longer characteristic waste.
7. Please explain the basis for your statement "developer solution considered as a non-listed RCRA waste".
8. Will you be requesting an EPA Identification number? If not please explain your reasoning.
9. Clarification concerning the Separator Unit from Technotreat 6000 is requested. Please explain your plans regarding whether the equipment will be "vapor vented into the atmosphere or condensed".
10. The resulting water will be "hailed off for utility discharge", please clarify what will be the final destination for this material. Have you obtained any formal agreements with the Publicly Owned Treatment Works (POTW), or other companies that will perform this service.
11. What is the anticipated amount of waste generated from the process and how will that material be profiled? What methods (testing/generator knowledge, etc.) will determine the material hazardous/non-hazardous.
12. Please be aware of potential insurance concerns regarding your operation. If a permit is deemed necessary as the operation advances, proof of insurance is required as part of the permit application.
13. Please submit a more detailed floor plan indicating your "concrete containment area approved by the DER".

H. Rafiee
OCD-HW-92-0003
January 15, 1992

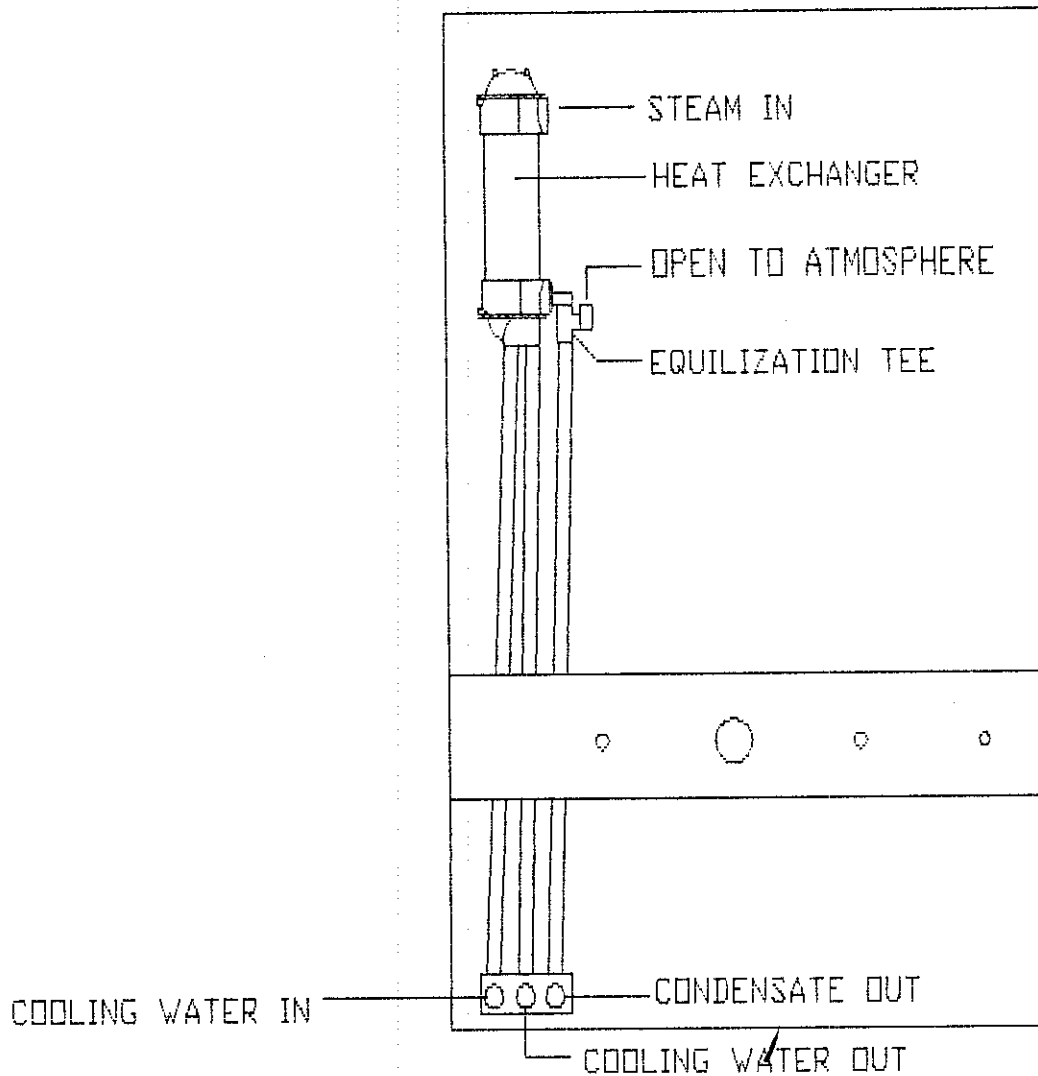
Please do not hesitate to contact the Hazardous Waste Section at
(407) 894-7555 if you have questions.

Sincerely,

Robert T. Snyder
Robert T. Snyder, P.E.,
Section Manager
Hazardous Waste Program

RTS
RTS/mm

CONDENSER OPERATION

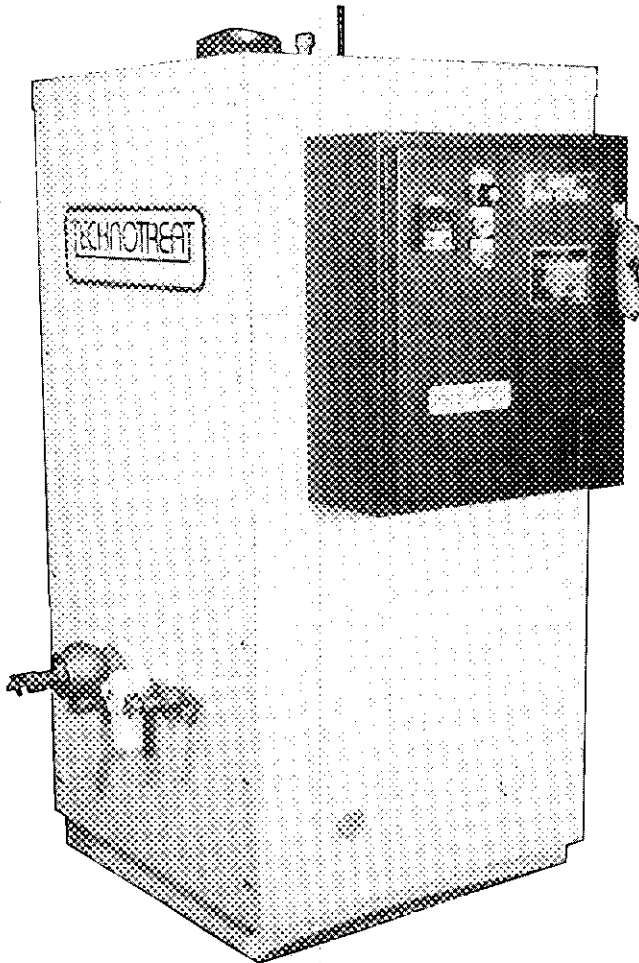


Steam produced in the T6000 is piped to a water cooled heat exchanger where it is condensed. Condensate exits the exchanger on the lower shell side where it is piped to the manifold plate at the lower left hand corner of the unit. The condensate line has an equalization tee to eliminate any back pressure within the steam/condenser line. A portion of this tee is open to atmosphere, therefore allowing a maximum of 2' head when condensate is running out of the line.

ONEBUTTON
ONBUTTON
OFF

95-98%
Waste Reduction
Considerable Disposal Savings

DISPOSAL COSTS and REGULATORY COMPLIANCE are important elements of your company's hazardous waste disposal. Don't pay for water to be hauled at \$0.50 to \$5.00 per gallon with the associated liabilities when TECHNOTREAT CORPORATION has the answer.



TECHNOTREAT 6000 WASTE WATER EVAPORATOR

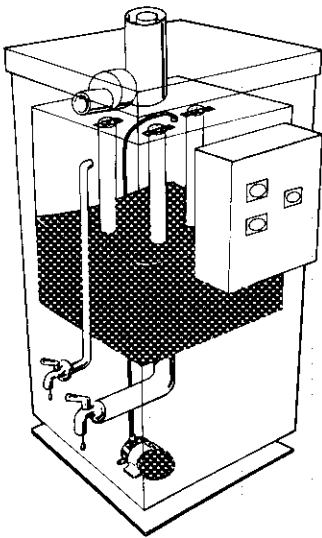
The Waste Water Evaporator is designed to reduce the disposal costs of small generators of hazardous waste. The T6000 will evaporate up to 100 gallons a day and reduce waste volume by 95-98%. The unit is filled by a self-priming pump, evaporated by stainless steel immersion heaters with the vapor vented into the atmosphere or condensed. The T6000 will automatically shut down if the waste water runs out or the temperature gets too high. It is easy to install, needs only 6 sq. feet of floor space and requires minimal maintenance.

A TECHNOTREAT 6000B WASTE WATER EVAPORATOR is available, similar in design but has the capability to evaporate 200 gallons a day with the same 95-98% waste volume reduction.

APPLICATIONS

- Machine Coolants
- Plating Wastes
- Parts Wash
- Paint Wash
- Ink Wastes
- Tumbling Water
- Chemical Solutions

WASTE WATER EVAPORATOR



Waste water is automatically fed into the evaporator by a feed pump from a drum or storage tank. The level is maintained by a level switch which activates the pump. Excess water is evaporated by electric immersion heaters. The generated steam is vented by an assisting electric blower. As water is evaporated, waste products are concentrated. Oil will float and can be drawn off the top periodically. Sludge and viscous materials are removed through a bottom drain. Additionally, the unit incorporates a removable top for easy, periodic cleaning.

SPECIFICATIONS

CAPACITY: T6000 @ 100 GPD/T6000B @ 200 GPD

POWER: 240.480 VAC; 12 KW **HEATERS:** Stainless Steel Immersion **VESSEL:** Coal-Tar Epoxy Coated
BLOWERS: 60 cfm **FEED PUMP:** Electric Diaphragm **LEVEL SWITCHES:** Magnetic-Float
INLET: 1/2 inch **OUTLET:** 2 inch, Concentrated Waste Draw — 3/4 inch Periodic Oil "Bleed-Off"

FEATURES

- 6 sq. ft. Floor Space Requirement
- Automatic Feed from Drum or Tank
- Insulated Tank
- High-Temperature & Low Feed Shut-Offs
- Powered Vent to Atmosphere
- Skid-Mounted
- Safe, Unattended Operation
- Immediate Installation
- Simple Operation & Maintenance
- No Permit Required
- Regulatory Compliance

OPTIONS

- Condenser (water or air cooled) Stainless Steel Vessel Titanium Heaters

BENEFITS

- ★ 95-98% Waste Reduction
- ★ Reduce Disposal Costs
- ★ Reduce Liabilities
- ★ Reduce Volume

*For more information,
please contact:*

TECHNOTREAT CORPORATION
 6216 S. Lewis Ave.
 Tulsa, OK 74136
 (918) 742-5052

TECHNOTREAT

Notes Re: Photographic Waste Control

Service of FT.

12/31/9

ALTAMONTE SPRINGS HILTON
AND Towers

Questions

General Information

Re: Photographic Waste Control
of Florida

- ① No indication they have filed for an EPA ID# (for the sludge they will generate).
- ② My impression is they believe Silver (D011) is the only reason this waste would be hazardous. Fixer Solution / Developer is sometimes Ignitable (D001) +/- Corrosive (D002) depending on the products themselves. (Developers - Petroleum based?)
- ③ If they plan on using a manifest the waste stream and waste codes must reflect properly the material generated. (? Not listed RCRA Waste Developer)

Reservations

1-800-247-1985 • 407-830-1985



ALTAMONTE SPRINGS HILTON

AND *Towers* Transportation

④ 'All vehicle operators will be
CDL Licensed operators w/
Hazardous Waste endorsements'

-? Does CDL stand for
Commercial Drivers License

-? What is meant by hazardous
waste endorsements

Processing

⑤ How do they plan on assuring
the Ion Exchange Units will
reduce the silver content of the
solution to achieve the standards
set forth

- No testing is implied/written
other than "tested periodically"

- Will they recycle the material until the
reach gc. methods.



ALTAMONTE SPRINGS HILTON
AND *Towers*

⑥ Waste water Separator Unit
from Technotreat 6000

"Evaporated by stainless steel
immersion heaters with the
vapor vented into the atmosphere
or condensed"

- If they intend on eventually
picking up from SPG's they should
check Air Section to see if a
permit is required.

⑦ The resulting water hauled
off ~~to~~ for utility discharge.

- ? Do they mean a POTW or
are they planning to release
this to storm water drain?

I remember him saying they were
on a septic system and the mgr.
would not allow them to discharge
their "distilled water" to it.



ALTAMONTE SPRINGS HILTON
AND *Towers*

⑧ The remaining sludge will be transferred to 55 gallon

- They will have to profile this which I believe would require them doing a TCLP because of the various businesses they will be receiving it from. Difficult to use generator knowledge.

⑨ How often do they plan on shipping i.e. - how much waste will they generate in a month's time?

Should they be a Generator or SQG themselves and are they aware of the requirements of each?

⑩ Are there any insurance concerns regarding their operation?



ALTAMONTE SPRINGS HILTON

AND Towers

Facility

⑪ Concrete Containment area approved by the DER? The Floor Plan is not very detailed.

⑫ Spill Guns sound like they are to repair leaking containers -? what is material in container is 1001

⑬ Spills - first pH using what (paper/meters)?
They are concerned if the material is Acid/Agent A or Caustic/Agent C
What if material is 1001, or toxic?

⑭ Spill material transferred to designated containers for proper disposal - immediately?
Or will it be stored?

- Technotreat letter not signed
- Nothing from POTW about receiving their "distilled water"

Reservations

1-800-247-1985 • 407-830-1985

Bahrain - 305 9890
731 9890
Bahrain Ahmadi

Wash. 1 year 151/570 gpa

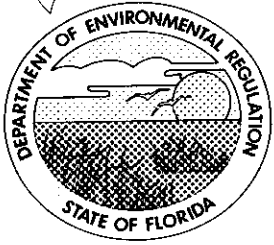
EFF 10% Non-impacted

53 gal every month depending
1000 gpa of chemical / week

12,000 gal / week depending on
end of the processing every day 35 gal / week



APR 1992



Florida Department of Environmental Regulation

Central District • 3319 Maguire Boulevard, Suite 232 • Orlando, Florida 32803-3767

Lawton Chiles, Governor

Carol M. Browner, Secretary

January 2, 1992

OCD-HW-92-0003

Hamad Raiffee
9125 Kimberly Place
Boca Raton, FL

Subject: Photographic Waste Control of Florida
Pilot Plan

Dear Mr. Raiffee:

Ms. McGehee discussed your presentation with me and I have examined the information which you have submitted. We are very interested in the success of businesses which can reduce the amount of hazardous waste generated for disposal, provided such facilities operate within the regulatory frame work. Before we can respond to you in writing concerning the conditionally exempt small quantity generator exemption, we would need you to respond to the following concerns:

1. How would you determine that your customers are actually conditionally exempt and what documentation would you be able to provide to the department inspectors?
2. You should be aware that the hazardous waste treatment permitting process is both lengthy and expensive. We would need more specific information concerning your timetable for offering services to conditionally exempt and later to small quantity generators.
3. Transporters of this waste should be approved hazardous waste transporters. Please explain the meaning of "-----CDL licensed operators with hazardous waste endorsements." While the conditionally exempt generator may transport his own waste in small quantities, this exemption would not pass onto a transporter who will collect from numerous conditionally exempt generators possibly accumulating quantities of 300-500 gallons.



H. Raiffee
OCD-HW-92-0003
Jan. 3, 1992

2500 3 Sample Test
-RCRA Waste

4. We are concerned by your test methods to determine when silver recovery is complete. The regulatory limit of silver is 5 milligrams per liter while the literature you provide from Dupont addresses testing by silver strips and contains the notation that "silver test paper does not consistently identify -----silver in concentrations below 0.5 gm/L (500 milligrams)".
5. Will your process be continuous or operate in batches? How long would you store waste solutions before they will be processed? Please provided us an estimate of your anticipated volume, including potential customers by industry so that we may better evaluate your proposal.
6. Please describe your process more precisely including capacities of the holding tanks, method of operation (batch or continuous), more information on how you will determine that processed solution following silver recovery is no longer characteristic waste.
7. Basis for your statement "developers solution considered as a not listed RCRA waste".

Sincerely,

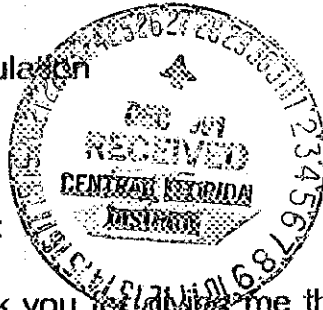
Robert T. Snyder, P.E.
Section Manager
Hazardous Waste Program

RTS/1

December 26, 1991

Ms. Mary McGehee
Department of the
Environmental Regulation
Orlando, Fl. 32803

Hamed Rafiee
9125 Tivoli Place
Boca Raton, Fl 33434



Dear Ms. McGehee:

I would like to thank you for giving me the opportunity to meet with you on December 19th.

As we discussed in our meeting my intention is to start a business in reducing photographic hazardous waste produced by Conditionally Exempt Small Quantity Generators. The intended facility is to be located in the city of Longwood, Seminole County, Florida.

After my visit with you I went to the Land Management Department in Seminole County and submitted an application to the Seminole County Board of Adjustment. The meeting to request permission to conduct business in the intended facility is scheduled on January 27th. The Land Management Department has requested to receive either a permit or an exemption letter from the DER before making a recommendation to the Adjustment Board regarding our application. From my conversation with you, it is my understanding that since I am only working with Conditionally Exempt Small Quantity Generators, we only need an exemption letter.

As you requested during our meeting I am submitting the enclosed documents for your review. They contain the Pilot Plan, Floor Plan and Equipment documents. I will contact you in early January to see if you require further information in preparing the exemption letter. Please feel free to contact me at (407) 482-6893, if you have any questions.

Thank you in advance for your cooperation in this matter.

Sincerely,

Hamed Rafiee

Hamed Rafiee

GENERAL INFORMATION

The Photographic Waste Control Inc. will, originally, provide services to the Conditionally Exempt Small Quantity Generators of x-ray and photographic waste solutions to insure proper disposal of their waste according to federal, state and county regulation. These services will be extended to the Small Quantity Generators when the necessary permits, from the Department of the Environmental Regulation, are obtained.

Two types of solutions will be treated by the Photographic Waste Control Inc. These solutions are commercially called Fixer solution or Finishers and Developer solution.

Fixer solution is considered as Hazardous Waste (EPA Code D011) due to its heavy silver content. Developer solution is considered as a Not Listed RCRA Waste, however it has recently been regulated by the Department of the Environmental Regulation for no discharge.

The general scope of the services provided by the Photographic Waste Control, Inc. are presented in the following order.

- 1- Transportation
- 2- Processing
- 3- Facility

1-TRANSPORTATION

The Photographic Waste Control, Inc. will supply the generators with corrosive resistance and D.O.T. approved containers to insure proper storage and transportation.

Before shipment all generators will receive a hazardous waste manifest (EPA Form 8700-22) for their records. The manifest will show the type of solution being transported as either Hazardous Waste Liquid NOS D011 ORM-E NA9189 (FIXER), or Not Listed RCRA Waste (DEVELOPER). Although The manifest system is not required to be used for the Conditionally Exempt Small Quantity Generators it will be used for record keeping purposes.

All vehicles will be equipped with an emergency spill control kit to be used at times of emergency and all vehicle operators will be CDL Licensed operators with Hazardous Waste endorsements.

2- PROCESSING

Upon arrival, the waste solutions will be delivered to the unloading area. The solutions are separated in two categories of Silver Bearing (Fixer Solution) and Not Listed RCRA Waste (Developer Solution).

Fixer Solution

Upon arrival, Fixer solution and bleach fixer solution will be transferred to their respective silver recovery tanks connected to an automated system. This system will transfer the solutions to the primary silver unit, tailing recovery unit and the Ion Exchange Units (See the attached DU PONT SILVER MANAGER literature). The Ion Exchange Units will reduce the silver content of the solution to achieve the standards set forth by federal, state and local authorities. The outcoming solution will be tested periodically by analytical methods for quality control purposes. When the silver recovery operation is completed the remaining solution is processed as a Not Listed RCRA Waste (Developer Solution).

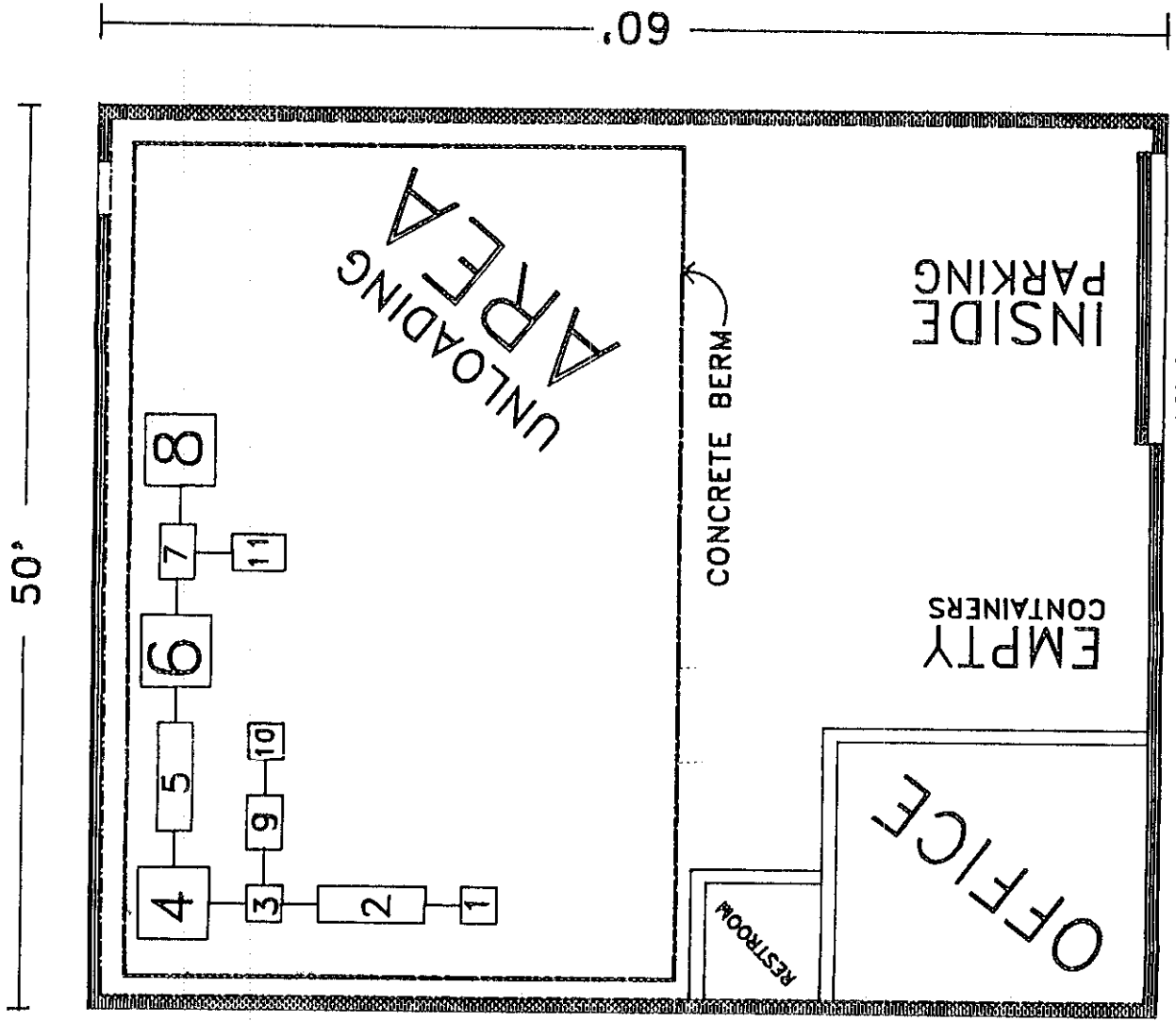
Developer Solution

Developer solution contain approximately 85 percent water. These solutions are transferred to holding tanks connected to a Waste Water Separator Unit (See the attached literature from TECHNOTREAT). This unit will separate the water from other components. The resulting distilled water will be accumulated in a holding tank and will be hauled for utility discharge. The remaining sludge will be transferred to 55 gallon lined drums to be shipped for proper off-site disposal.

3- FACILITY

- 1) All chemicals will be stored and processed inside the warehouse within the concrete containment area approved by the Department of the Environmental Regulation (See the attached Floor Plan).
- 2) All containers, used for transportation and processing, will be labeled properly for identification and will be inspected daily for leaks.
- 3) Spill Guns will be mounted on the walls to be used for any container leaks.
- 4) Spill-x agents will be used If a spill occurs, The personnel at the facility will first PH the spill to find if the spill is acidic or alkaline. Upon determination of the PH, agent A (for acid spills) or agent C (for caustic spills) will be applied for neutralizing and solidifying before clean up. After application of the proper agent, the solidified material will be swept up and transferred to the designated containers for proper off-site disposal.

FLOOR PLAN



KEYS

- 1) Holding tank for incoming Silver Solution
- 2) Silver Recovery Units
- 3) Pumping Station
- 4) Elevated Tank
- 5) Ion Exchange Units
- 6) Holding Tank
- 7) Waste Water Separator Unit
- 8) Holding Tank for Disstilled Water 1000 gal
- 9) Silver Recovery Units
- 10) Holding Tank for Incoming Bleach Fix Solution
- 11) Holding Tank for Incoming Developer Solution

16' X 14' OH. DR.



October 16, 1991

Bahram Ahmadi
708 N.W. 47th St.
Pompano, FL

Dear Bahram:

Thank you for your call regarding the use of our Technotreat 6000 Evaporator for reducing the volume of your photo waste water. I would suggest you neutralize any acid solutions before evaporation to prevent the formation of volatile acids. Our largest evaporator will evaporate 200 gallons per 24 hours. It can be retrofitted with either a water or air cooled condenser. The distilled water could either be recycled or sewerred, but with the condenser, there would be no air emission.

Please note the enclosed drawing and price list. Financing is available from Pioneer Leasing. An application is enclosed.

Since you already have experience in evaporators, you understand it is an effective method of reducing volume. Chemical treatment is difficult because the photo salts are very soluble. Other than neutralization, I do not know of another way of treating this mixture.

Sincerely, for
TECHNOTREAT CORPORATION

Richard J. Bigda, P.E.
President

RJB/a
encl.

The Technotreat Corporation, 6216 S. Lewis, Suite 106, Tulsa, OK 74136
(918) 742-5052, Fax: (918) 742-5585

DU PONT
SILVER
MANAGERTM
RECOVERY CARTRIDGE





DuPont Silver Manager™

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INTRODUCTION

The SILVER MANAGER™ Cartridge recovers silver from spent fixer. Intended to be a primary recovery system, the SILVER MANAGER™ system is normally connected directly to a film processor or fixer holding tank. The SILVER MANAGER™ system operates on the metallic-replacement principle, enhanced with DuPont technology.

A typical installation uses two SILVER MANAGER™ Cartridges in series. When the lead cartridge approaches depletion (determined by a quick, weekly test) you remove it from service and replace it with the "second" cartridge. A replacement cartridge (a spare should be kept on site) is installed as the new "second" cartridge in the series. This rotation protects you from silver loss to your drain while making the best use of cartridge capacity.

A videotape explaining the installation and operation of the SILVER MANAGER™ Cartridge may be obtained by calling your local dealer or customer service.

INSTALLATION

1. Unpack each SILVER MANAGER™ cartridge and verify receipt of the following items:

- o SILVER MANAGER™ cartridge with instructions
- o Plastic bag and closure tie

Other components available from your dealer or customer service:

- o Installation Parts Kit which contains:
 - Ten feet of PVC flex-tubing (3/4" OD; 1/2" ID)
 - Quick-Disconnect tool
 - Two Quick Disconnect washers
 - Four Quick Disconnect barbed stems
 - Four plastic clamps
 - Sample Valve (Pre-assembled)
 - Two 90 Degree Quick Disconnect Elbows
- o Training Video
- o Silver Test Paper

DuPont SILVER MANAGER™ Cartridges
Installation Instructions

NOTE: If possible, play the video before proceeding.

2. Inspect the fixer outlet hose at the processor (or holding tank). If it is not the same size as the PVC tubing supplied with the cartridge, then install an adapter to make it compatible. For most installations, the barbed stem provided in the Installation Kit should serve as an adapter, if not, then one can be obtained by calling your dealer or customer service. **THESE UNITS ARE DESIGNED FOR FIXER ONLY.** If your processor has not been modified to accommodate silver recovery, please do so before installing these units.
3. The SILVER MANAGER™ Cartridge is a gravity-flow device, so several inches of liquid head pressure is required to induce flow. Be sure that the processor overflow liquid level is higher than the following minimums, with the cartridge resting on the same floor or platform as the processor: 12.0 inches for the SMC-4; 17.25 inches for the SMC-7; and 28.0 inches for the SMC-11. This will prevent liquid from backing up into the processor. Ensure that the cartridge **OUTLET** port is higher than the drain, and that the drain is not plugged.
4. Using the supplied Quick Disconnect Tool, remove the plugs from the cartridge **INLET**, **OUTLET** & **VENT** ports. Press the locking collar into the female fitting, and then pull the plugs out of the locking ring while continuing to press in on the locking collar. **DO NOT FORCE OUT THE PLUGS WITHOUT USING THE TOOL, AS EXCESSIVE FORCE MAY CAUSE BREAKAGE.** Save these plugs to seal the cartridge when shipping for processing. Store them in the box with the replacement cartridge. See instructions (Page 11) for use of the Quick Disconnect Tool.
NOTE: The locking collar may be fitted with a Quick Disconnect Washer. These plugs may be removed without the use of the Quick Disconnect Tool. See instructions (Page 11) for use of the Quick Disconnect Washer.
5. For each SILVER MANAGER™, connect the PVC tubing (provided) to the cartridge **INLET** & **OUTLET** ports using the barbed stem connectors. Since the stem connectors will simply push into the fittings, the Quick-Disconnect tool is not required. See instructions (Page 11) for fitting use.

DuPont SILVER MANAGER™ Cartridges
Installation Instructions

6. Cartridges must be pre-filled to work properly. If not pre-filled, there is risk of affecting cartridge efficiency.

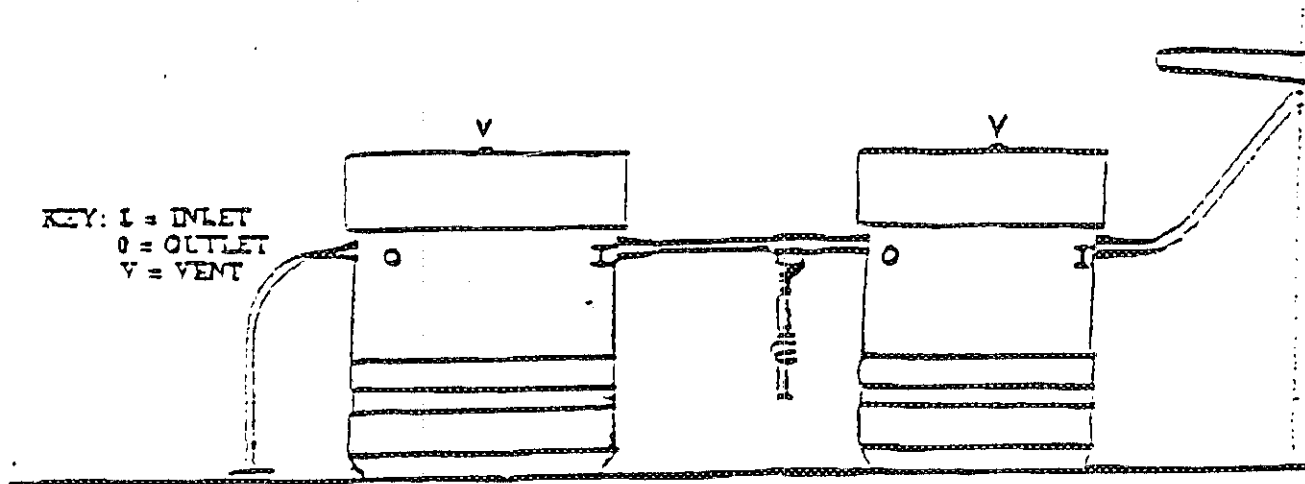
Pre-fill the entire cartridge system with cold water through the first cartridge INLET. Fill the system SLOWLY to prevent overflowing cartridges through the vent ports. For pre-filling, temporarily adapt a section of the hose (from the Installation Kit) to a faucet. This hose will later be used as the drain hose as the installation is completed. The cartridges are pre-filled when water flows from the cartridge OUTLET. If the cartridges could not be filled in-place, reinsert shipping plugs when transporting cartridges to their permanent sites.

DO NOT PRE-FILL ANY SPARE CARTRIDGES. LEAVE THEM IN THEIR ORIGINAL CARTONS UNTIL NEEDED. THESE CARTONS MAY BE USED LATER TO RETURN DEPLETED CARTRIDGES.

7. Place the cartridges in their final positions and connect them with the tubing and stem connectors and sample valve provided (with the OUTLET of the first position cartridge connected to the INLET of the second using the sample valve). Use the plastic clamps to firmly attach the tubing to the stem connectors. Tighten all clamps with pliers.

NOTE: Cut all tube lengths to minimize the length and sag of the tubing. This helps prevent bubble entrapment, which could restrict fixer flow.

8. Connect the processor (or holding tank) outlet hose to the INLET of the first cartridge, using the plastic stem connector secured with a plastic clamp.
9. Run enough fixer through the system to check for tubing leaks and positive flow to the drain. Repair leaks if necessary.



SPECIAL INSTALLATION NOTES

1. Be sure cartridges are correctly connected so that fixer flows into the INLET port and out the OUTLET port. (Otherwise, cartridge effectiveness will be severely reduced.)
2. Sample valves are pre-assembled and ready to connect to the OUTLET of the first cartridge and the INLET of the last cartridge. See page 12 for use of the sample valve.
3. Fixer samples can be taken between cartridges by either:
 - 1) Using the #2 cartridge inspection port for sampling (see Page 6 "special notes"), or 2) using sample valves (see Page 12).
4. SMC-4 cartridges may be stacked two-high (to save floor space) if the processor overflow is greater than 27 inches above the floor. Use the stacking kit components to connect the two cartridges together. Please call your local dealer or customer service to obtain these components.

DEPLETION-TESTING OF SILVER MANAGER™ CARTRIDGE

1. Cartridge system maintenance requires periodic testing with test-strips sensitive to ionic silver. Please refer to the enclosed instructions for Silver Test Paper (Page 10).
2. A cartridge is considered depleted when the OUTLET fixer silver content is 1.0 gm/l or higher. ~~NOTE: Silver test paper will not readily identify fixer silver concentrations below 0.5gm/l.~~ For greater precision, analytical methods (such as Atomic Absorption Spectroscopy) are required.
3. DuPont now offers SILVER CERT™, a service for determining ionic silver concentrations in photographic fixer and washwater. (See page 13 for more information on SILVER CERT™).
4. Follow the test-paper instructions on the package to evaluate silver content. Note that the test-strips are only valid for a limited time after being dipped in fixer. The resulting color will drift over time, so once the strips are used, they cannot be saved for later evaluation.
5. Additional silver test paper is available from DuPont and can be obtained by calling your local dealer or customer service.

SPECIAL NOTE: Use of sample valves is recommended, if not used then another option is to dip the test strips directly into the fixer through the 2 inch Inspection Port, as follows:

- o Unscrew the plug in the Inspection Port on the second (trailing) cartridge (the liquid at the top of the second cartridge is the effluent fixer from the first cartridge).
- o Using long tweezers or pliers, grip the test-strip securely and dip it into the liquid directly beneath the Inspection Port.
- o Follow the test-paper instructions on the package to evaluate silver content.
- o Screw the plug back into the Inspection Port.

ROTATION OF CARTRIDGES

NOTE: We recommend using an SMC™ Draining Pump for cartridge rotations, to minimize the time and effort required. A separate procedure for cartridge rotation is used with the SMC™ Draining Pump. The SMC™ Draining Pump can be obtained by calling your local dealer or customer service.

PROCEDURE FOR ROTATION OF THE SMC™ (Without Pump)

1. When testing indicates that the cartridge is ready for rotation, disconnect the #1 (lead) cartridge from the processor.
2. Move the second cartridge in the system into the lead position and reconnect the processor to the INLET of this cartridge. Leave the existing drain line in place.
3. Connect the water supply to the INLET of the harvested cartridge. Connect the OUTLET of this cartridge to the INLET of the new cartridge to be installed.
4. Slowly flush water through the harvested cartridge until the new cartridge is filled. (This step eliminates pre-filling the new cartridge with water).

DuPont SILVER MANAGER™ Cartridges

Installation Instructions

5. After the new cartridge has filled with liquid, turn off the water supply and disconnect all hoses. (It may be necessary to utilize the shipping plugs at this time to prevent spillage during transport of the cartridge).
6. Move the new cartridge to the processing area and install in the #2 (trailing) position, utilizing all the hoses and valves from the original system.
7. Locate the harvested cartridge to be returned near a drain, install the shipping plugs into the INLET and OUTLET ports of this unit, leaving the vent port open. Allow the cartridge to sit for 24 hours.
8. At the end of the 24 hours, remove the plugs from the cartridge and slowly tip the INLET port of the cartridge over the drain. (Doing this slowly prevents the agitation of any solids which may have been collected in the cartridge). Allow the liquid from the cartridge to drain slowly until the first sign of color change. The liquid will change from clear in color to grayish/black.

NOTE: If the cartridge does not drain adequately, then also try draining through the OUTLET port.
9. Return the cartridge to it's upright position and re-install the shipping plugs into all ports (INLET, OUTLET & VENT). Also make sure that the Inspection Port plug is secure (tight).
10. Sign and date the return label on the cartridge to verify that the cartridge has been FLUSHED and DRAINED in accordance with these instructions.

WARNING: To ensure this unit is RCRA non-hazardous after use, it **MUST** be FLUSHED and DRAINED prior to return shipment.
11. The cartridge is now ready for packaging and return shipment for processing.

PROCEDURE FOR ROTATION OF THE SMC™ (with pump)

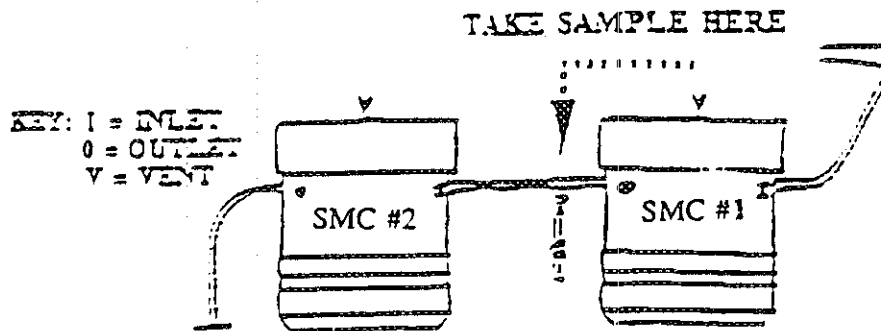
- 1) When testing indicates that the cartridge is ready for rotation, disconnect the lead (#1) cartridge system from the processor.
- 2) Slowly pump the contents of the #1 (lead) cartridge to be harvested into the #2 cartridge in the series. (See SMC™ Draining Pump instructions for use)
- 3) Disconnect the #1 (lead) cartridge to be harvested from the #2 cartridge and locate the #1 cartridge near a water supply. Move the #2 cartridge in the system into the lead position and reconnect the processor to the INLET of this cartridge.
- 4) Connect the water supply to the INLET of the harvested cartridge. Connect the OUTLET of this cartridge to the INLET of the new cartridge to be installed.
- 5) Slowly flush water through the harvested cartridge until the cartridge is filled (liquid is seen overflowing into the new cartridge).
- 6) Disconnect the water supply from the harvested cartridge. Pump the liquid from the harvested cartridge into the new cartridge.
- 7) After the new cartridge has filled with water, disconnect all hoses. (It may be necessary to utilize the shipping plugs at this time to prevent spillage during transport of the cartridge)
- 8) Move the new cartridge to the processing area and install it in the #2 (trailing) position utilizing all the hoses and valves from the original system.
- 9) Prepare the harvested cartridge for shipment by installing all the shipping plugs. Also make sure the inspection port is secure (tight).
- 10) Sign and date the label on the cartridge to verify that the cartridge has been FLUSHED and DRAINED in accordance with these instructions.

11. The cartridge is now ready for packaging and return shipment for processing.

SHIPMENT OF CARTRIDGES

1. Re-use all box materials from the new replacement cartridge to pack the harvested cartridge.
2. Be sure all three ports (INLET, OUTLET & VENT) are plugged. Also make sure the Inspection Port plug is secure (tight).
3. Unfold and open the plastic return shipping bag and place it into the empty shipping container.
4. Place the cartridge into the plastic return shipping bag.
5. Pull the plastic bag up around the cartridge; now gather the bag as tightly as possible at the vent port, twist, and seal with the tie-wrap provided.
6. Place the shipping carton lid onto the carton and seal for shipment.

IMPORTANT: The cartridge box and packing material is designed specifically to protect the cartridge in transit. Call your dealer or our customer service department to purchase a replacement box if needed. **DO NOT SHIP A CARTRIDGE WITHOUT FIRST PACKING IT IN A DUPONT CARTRIDGE BOX CONTAINER.**



- 1) Perform this test near the end of a typical operating period (4-6 hours running). Be sure that the processor is actively replenishing fixer.
- 2) Take a 20 ml sample from the OUTLET line of the first cartridge as shown in the above diagram.
- 3) Briefly dip a test strip into the sample. Wait thirty (30) seconds and then read the silver result (see Step #4 below).

NOTE: Do not let the strip "age" more than 30-40 seconds, as the color indication tends to decay with time. It also follows that the test strips cannot be saved for later evaluation.

- 4) Compare the strip's color against the color chart on the side of the strip container. If the silver reading is 1.0 gm/L Ag⁺ (or higher), then the first cartridge in the series is ready for removal.

NOTE: Silver test paper does not consistently identify ionic silver in concentrations below 0.5 gm/L.

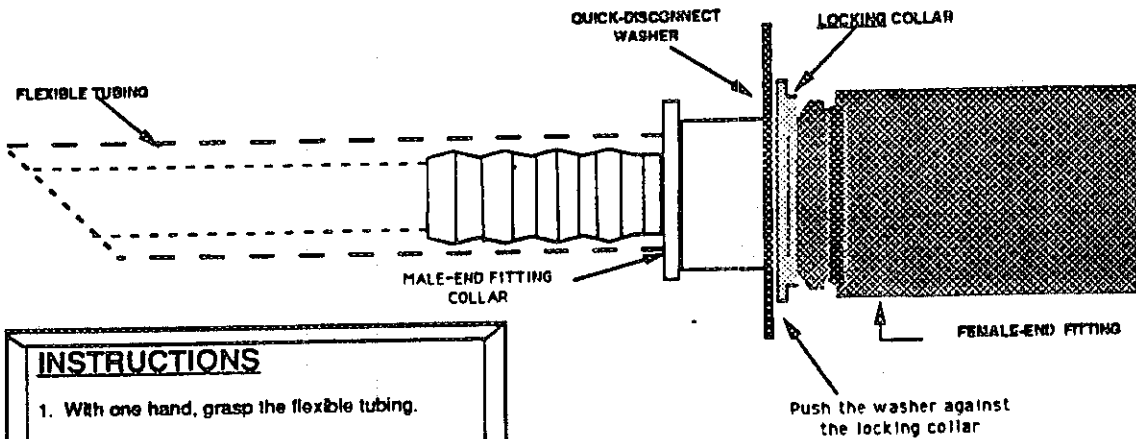
- 5) Flush and rotate the Silver Manager™ system according to the cartridge rotation procedure provided on page 6.

NOTES: SILVER MANAGER™ cartridges remove silver from fixer solutions by substituting iron in the solution as silver is removed. The last cartridge provides protection against silver passage to the drain. Once silver is detected in the OUTLET of the first cartridge, it is time to rotate the system to refresh this "last-cartridge protection".

SILVER MANAGER™ QUICK-DISCONNECT FITTINGS

The Quick-Disconnect Washer is designed to hold the Locking Collar **EVENLY** while pulling out the Male-End Fitting. (Holding the Locking Collar on one side is **inadequate** since the collar will twist and continue to hold on to the male-end fitting.)

Follow the **THREE-STEP INSTRUCTIONS** below.

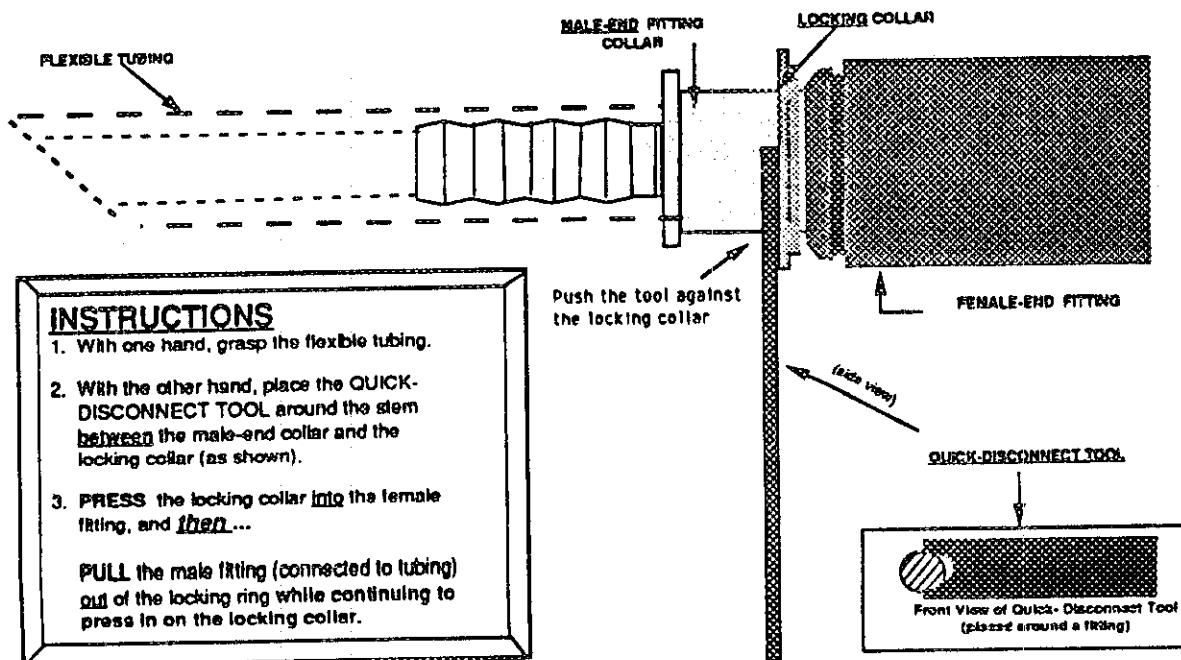


INSTRUCTIONS

1. With one hand, grasp the flexible tubing.
2. Using the thumb and fore finger of the other hand, push the QUICK-DISCONNECT WASHER against the locking collar firmly.
3. **PULL** the male fitting (connected to tubing) **OUT** of the locking ring while continuing to press in on the locking collar.

The Quick-Disconnect Tool is designed to hold the Locking Collar **EVENLY** while pulling out the Male-End Fitting. (Holding the Locking Collar on one side is **inadequate** since the collar will twist and continue to hold on to the male-end fitting.)

Follow the **THREE-STEP INSTRUCTIONS** below.



INSTRUCTIONS

1. With one hand, grasp the flexible tubing.
2. With the other hand, place the QUICK-DISCONNECT TOOL around the stem **between** the male-end collar and the locking collar (as shown).
3. **PRESS** the locking collar **into** the female fitting, and **then...**

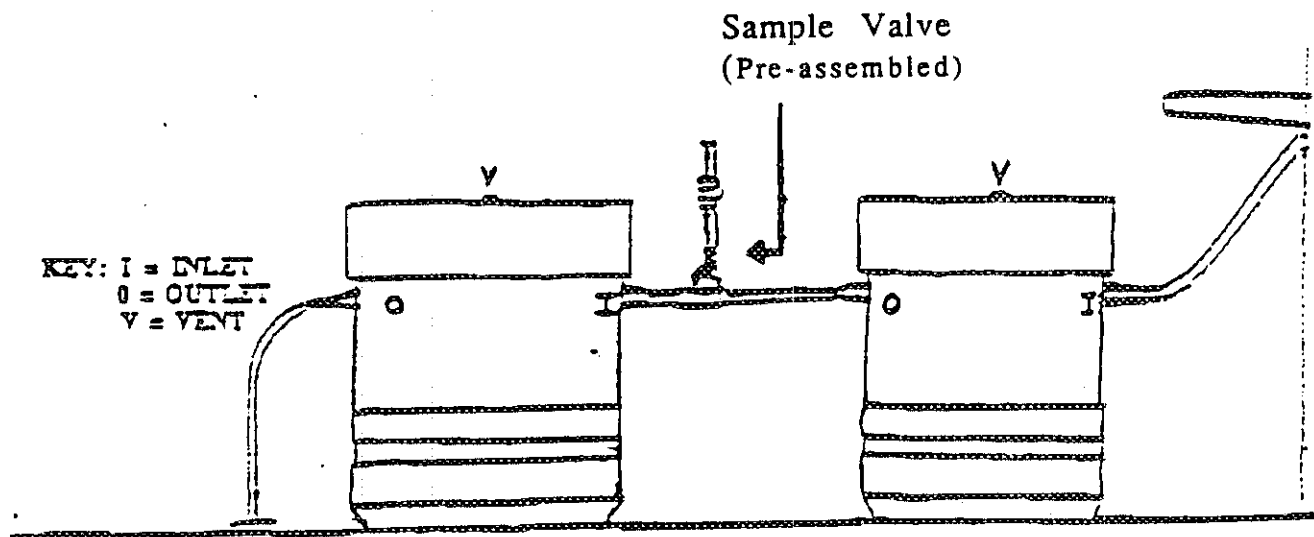
PULL the male fitting (connected to tubing) **OUT** of the locking ring while continuing to press in on the locking collar.

SMC™ SAMPLE VALVE ASSEMBLY
Installation Instructions

1. After attaching the processor fixer overflow hose to the INLET of the lead (#1) cartridge, insert one stem connector on the Sample Valve assembly into the OUTLET of the lead (#1) cartridge and the other end of the sample valve assembly into the INLET of the second cartridge.
2. The Sample Valve is now ready for use.

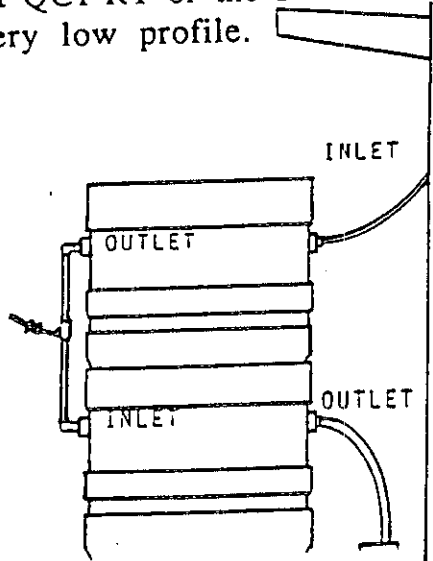
NOTE: When not in use, the Sample Valve tube should always be oriented in a vertical (upright) position and the surgical clip closed. This prevents old fixer from settling in the closed portion of the valve.

3. To use, rotate the valve body so that the stem is pointing down. Next, open the white surgical hoseclamp and draw a 20-30 ml. sample into a small clean container. Finally, close the tubing shutoff clamp and return the stem to its upright (storage) position.



Instructions for:	SMC™ STACKING KIT
For use with:	4-Gallon Size only!

1. Pre-fill cartridges and move to processing location.
2. Place the first SMC in the desired location and remove the VENT plug.
3. Now place the second cartridge on top of the first SMC. Make sure that the OUTLET of the top cartridge lies directly above the INLET of the lower cartridge. Both of these ports should also be facing front, or to an accessible side location.
4. Install one of the 90 Degree Quick Disconnect Elbow into the OUTLET of the top SMC and the other elbow into the INLET of the bottom SMC.
5. Next, install the Sample valve Assembly into these elbow fittings.
6. Connect the processor fixer overflow line to the INLET of the top cartridge, and the drain hose to the OUTLET of the bottom unit, and route this hose to the drain.
7. This configuration is not applicable to Day-Lite Processors such as the Du Pont QC1-RT or the Kodak M-7. This is due to the units being very low profile.



Du Pont SILVER CERT™ & METAL CERT™

Analytical Services

Du Pont now offers SILVER CERT™ & METAL CERT™ a service for determining ionic silver concentrations in photographic fixer and washwater. SILVER CERT™ & METAL CERT™ follow the EPA guidelines for metals analyses of photographic effluent, and is run at our EPA certified laboratory.

SILVER CERT™ is a comprehensive service.

The SILVER CERT™ & METAL CERT™ kits include sample bottles, labels, our unique security seals, a shipping container and easy-to-read instructions.

A laboratory Chain-of-Custody form which fully documents custody is also a component in the kit.

Prices include delivery to customer (Only within the 48 contiguous U.S. states; otherwise, shipping charges are additional).

Return-shipping is customer's responsibility.

29 Metals
Analysed

With the Silver Cert™ testing program, additional metals may be tested and included in the report at an additional charge (Up to 29 metals). For more information please contact your local Du Pont representative.

SMC™ ACCESSORIES AND SPARE PARTS

PRODUCT

SMC Installation/Spare Parts Kit

SMC Training Video

Silver Test Paper

SMC Sample Valve

SMC Stacking Kit

SMC Draining Pump

SMC Shipping Containers (if replacement needed)

Processor Outlet Hose Adapter

Sump System

Analytical Services:

SILVER CERT™

These items may be obtained by calling your local dealer or customer service.



IMAGING
ENVIRONMENTAL
SYSTEMS

August 15, 1990

CUSTOMER ADVISORY

A recent study of the condition of returned cartridges has brought to light that a number of cartridges are being sent in inadequately drained. This creates a dual concern for us a DuPont.

The number one concern is that the instructions which were furnished with the cartridges for flushing and draining, and which ensure that the contents are RCRA* non-hazardous, are not being followed completely. **REMEMBER, AS THE POTENTIAL GENERATOR OF A RCRA HAZARDOUS WASTE, YOU HAVE RESPONSIBILITIES AND LIABILITIES THAT EXTEND BEYOND YOUR PLANT GATE (so called "CRADLE-TO-GRAVE" RESPONSIBILITY). (WE CANNOT RELIEVE YOU OF THESE.**

The other is that DuPont is paying all freight charges. Since the cartridges are substantially heavier when filled with liquid the cartridges are costing more to ship. In addition, our "zero effluent" processing site incurs more cost to dispose of the extra liquids received.

Due to these circumstances, we must advise all our customers that effective September 1, 1990, any cartridges which we receive for processing will be checked. If any of the cartridges are received undrained, a surcharge of \$75 per cartridge will be assessed to offset our added freight and processing costs described above.

Please read and follow the attached updated procedures for flushing and draining.

If you have any questions on this matter, please call 1-800-346-1151.

* Resource Conservation and Recovery Act of 1976

Photographic Waste Control, Inc.

Protecting you and the environment.

1943 High Street
Longwood, Florida 32750
Telephone (407) 328-9651

To whom it may concern:

One of the main issues confronting the public today is the protection of our environment from becoming polluted with manmade contaminations.

The government, by enacting laws, has placed regulatory requirements on generators of hazardous wastes in order to safeguard the environment from toxic pollution. The state of Florida has adopted these regulations but has also chosen to be more stringent in their requirements.

We at the Photographic Waste Control, Inc. would like to remind you that all generators are legally responsible for proper disposal of their waste. If you are currently not disposing your photographic waste properly or need assistance in adequate handling of your waste contact us today. We are specialized in treatment of photographic waste and can provide you with quality service that meets all regularity requirements.

We would like to meet with you and discuss your waste disposal plan. Please call us at the above phone number or complete the form below and mail it back to us so we can contact you for an appointment.

Sincerely yours

PHOTOGRAPHIC WASTE CONTROL, INC.

COMPANY NAME: _____

PHONE NUMBER: _____

TYPE OF BUSINESS: _____

CONTACT PERSON: _____

GENERATED WASTE / MONTH: _____ (Gallons)

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Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Lawton Chiles, Governor

Carol M. Browner, Secretary

February 28, 1992

Mr. Philip Epstein
Vice President
Chemical Pollution Control
of Florida, Inc.
3428 SW 15 Street
Deerfield Beach, Florida 33442.

Dear Mr. Epstein:

The Department has received your January 28 letter requesting guidance on the proper management of Xray/photographic waste. Our response follows.

Question 1: Silver bearing waste film, are they regulated as a hazardous waste (D011) if there are 5 parts per million or more?

If you generate, transport, treat, store or dispose of solid waste, you are required by law to identify and evaluate your wastes. The Resource Conservation and Recovery Act (RCRA), in Title 40 Code of Federal Regulations (CFR), Part 261, contains lists specifying wastes that are regulated and characteristics for identifying non-listed hazardous wastes. Process knowledge may also be used to determine whether a solid waste is hazardous. Under the federal and state hazardous waste regulations, any waste (including film) containing five parts per million (ppm) or more of leachable silver (TCLP) would be hazardous waste by characteristic. Typically, fixant solutions would contain enough silver to be considered hazardous waste.

Question 2: Is any documentation required for shipping and disposal, i.e., manifest, bill of lading, EPA number, etc.?

Title 40 CFR, Part 262.11 requires any facility to make a hazardous waste determination. If the facility generates 220 pounds per month or greater of a hazardous waste (including many wastes that are recycled i.e., silver-containing photographic waste), the generator must obtain a DER/EPA ID number (262.12), use a manifest system [unless there is a reclamation agreement pursuant to 262.20(e)], and ship only to a permitted facility (Part 262, Subpart B). I have enclosed a more complete summary listings of regulatory requirements for small quantity generators and generators.

Philip Epstein
February 28, 1992
Page Two

Under the hazardous waste regulations, facilities generating less than 220 pounds per month and accumulate no more than 2,200 pounds of hazardous waste at any time are not subject to requirements of 40 CFR, Parts 262 through 268, and 270; and the notification requirements of section 3010 of RCRA. However, these "Conditionally Exempt" generators must ensure delivery of hazardous waste to a proper recycling or Treatment/Storage/Disposal (TSD) facility. They do not have to use a licensed hazardous waste transporter.

County Household Hazardous Waste Collection Centers will accept hazardous waste from conditionally exempt small quantity generators, for a reduced fee, during scheduled collections. I have enclosed a list of County-operated Household Hazardous Waste Collection Centers.

Question 3: Should an insured, licensed transporter be used for transportation?

The Florida Department of Environmental Regulation (DER) regulates hazardous waste transporters. Transporters must follow the rules contained in Part 263 of the hazardous waste regulation (40 CFR 263) and Florida Administrative Code (F.A.C. 17-730), which require the transporter to:

1. Obtain an EPA identification number (40 CFR Section 263.11) (phone 904/488-0300).
2. Operate under the manifest system (40 CFR Section 263, Subpart B).
3. Have the ability to clean up hazardous waste discharges during transportation-related incidents (40 CFR Section 263, Subpart C).
4. Have documentation for financial liability (F.A.C. 17-730.170).
5. Transporters storing greater than 24 hours at a transfer facility must notify the DER and meet many TSD requirements (F.A.C. 17-730.171), including containment, contingency plan, training, security, and closure.
6. All transfer facilities operated in the State of Florida must have an EPA identification number.

The above requirements apply to generators, TSD facilities, or companies that pick up hazardous waste from generators.

Facilities generating less than 220 pounds per month do not have to use licensed hazardous waste transporters but they have to ensure their waste is being managed properly. An unlicensed transporter could not pick up hazardous waste from businesses generating more than 220 pounds per month, or if the generator or transporter accumulates more than 2,200 pounds of hazardous waste at any time, or improperly disposes of the reclamation waste (to soil, surface/groundwater).

Philip Epstein
February 28, 1992
Page Three

Question 4: Does silver bearing film have to be manifested to an approved facility?

Yes, if the facility has characterized the silver waste as hazardous under Title 40 CFR, Part 262.11 and the facility is a 220-2,200 lb/mo. small quantity generator or large quantity generator.

Question 5: What type of storage requirements does one need to have when holding film in one's building?

The following management requirements are primarily for the 220-2,200 pound per month/small quantity generator but are also applicable to the conditionally exempt small quantity generator when more than 2,200 pounds of hazardous waste are accumulated.

- Maintain written records of the first date of accumulation, amount, type, and number of containers of each hazardous waste you generated.
- Place each waste type in separate containers. Do not mix different wastes together.
- As a small quantity generator, you are allowed to store on-site up to 13,200 pounds of hazardous waste for a period of 180 days.
- Prepare a Preparedness and Prevention Plan.
- Develop a modified Contingency Plan and Emergency Procedures.
- Container and tank management requirements (Part 265, Subpart I and 265.201 respectively).

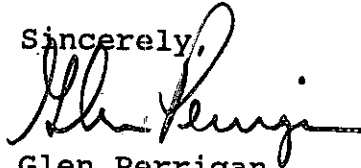
For a recycler who is recovering silver from waste picked up from conditionally exempt small quantity generators, there are no RCRA storage standards which apply. However, the wastes should be properly handled, or else the recycler may become subject to the full generator and facility RCRA requirements. Also, it must comply with the Clean Water Act pretreatment standards and only related locally based discharge limits for discharges to the sewer.

Philip Epstein
February 28, 1992
Page Four

Refer to the enclosed summary of the hazardous waste regulations for a more complete listing of requirements and references to the 40 CFR.

Please call me at 904/488-0300 if you have further questions or comments.

Sincerely,



Glen Perrigan
SQG Program Coordinator

GP/ps

Enclosures



State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION

To: *JW*
 To: *SS*
 To: *BU* *(30)*
 From: *RS*
MM *MM*

THEN
LIBRAR-1

Interoffice Memorandum

TO: Jeffrey Smith, Environmental Specialist II
Southeast District

THROUGH: Michael Redig, Environmental Manager
Hazardous Waste Compliance Section *M.R. 3/5/92*

FROM: Linda Lakes, Environmental Specialist III
Hazardous Waste Compliance Section

DATE: 6 March 1992

SUBJECT: Counting Wastes from X-ray Units



This memo is written to clarify the requirements for counting hazardous wastes to determine the generator status of a facility. In the example we discussed, a facility operates several x-ray units. The fixer and developer wastes from these units are hard-piped to a silver reclamation unit that utilizes both electrolytic and filter reclamation. Wastewater from the recycling unit is discharged directly to a sewer system that leads to a POTW. Should the x-ray unit waste be counted in determining the facility's generator status?

In the March 24, 1986, Federal Register, EPA discusses the adoption of 40 CFR 261.5(c), which clarifies that hazardous waste excluded or exempted from substantive regulation is not counted in making quantity determinations for purposes of determining generator status. Wastes excluded from regulation under 40 CFR 261.4 includes wastes discharged to a POTW and commingled with domestic waste. These wastes are not counted unless they are stored or treated in regulated units prior to being discharged.

In the scenario described above, the x-ray unit wastes are sent through a silver reclamation unit, which is exempt pursuant to 40 CFR 261.6, prior to being discharged to a POTW, which would exclude the waste from RCRA regulation. The fixer and developer wastes would not be counted in determining the facility's generator status. Any residues or sludges resulting from the reclamation process, if determined to be hazardous, would be subject to regulation and would be included in the quantity determination.

40 CFR 261.6(a)(2)(v)

6 March 1992
Memo to Jeff Smith
Page Two

If the fixer and developer wastes were collected from the x-ray units and shipped off-site for reclamation, the wastes would be included in the quantity determination pursuant to 40 CFR 261.5, which states that, "Hazardous waste that is subject to the requirements of... Subparts C, D, and F of Part 266 is included in the quantity determination...".

The January 9, 1990, memo from EPA, "Interpretation of the Domestic Sewage Exclusion", which summarizes a U.S. Court of Appeals decision relating to wastes entering a POTW from an industrial park does not apply in this scenario. The Puerto Rico case specifically pertained to a POTW that contained only wastes from an industrial park (not mixed with any domestic waste). This is not the case in the above scenario, where the facility's sewer discharges into a POTW's sewer lines where domestic waste is present.

/11

Attachment: 3/24/86 Federal Register

In proposing to remove the 100-1000 kg/mo generators from § 261.5, the Agency was attempting to address the complexity and confusion caused by having multiple classes of small quantity generator subject to significantly different standards. The Agency is sympathetic to the concerns of these commenters and in no way intended the redefinition to add to the confusion which many of these firms may experience in becoming subject to the bulk of the RCRA regulatory program for the first time. For the reasons discussed below, EPA has decided not to alter the existing definition of "small quantity generator" but is making modifications to § 261.5 that will provide a more explicit labeling scheme for regulatory purposes.

Section 261.5 has historically addressed those hazardous waste generators that were conditionally exempt from most of the hazardous waste regulatory program. Until the HSWA of 1984 and the subsequent codification of its early enactment provisions on July 15, 1985, only two major classes of small quantity generator existed: those generating or accumulating acutely hazardous wastes below certain quantity cutoffs and those generating or accumulating below 1000 kg of most hazardous wastes. Furthermore, both classes were largely exempt from the standards applicable to large quantity generators.

However, with the addition of a new class of small quantity generator designated by Section 3001(d) of HSWA (*i.e.*, those generating between 100 kg and 1000 kg of hazardous waste in a calendar month) that would be subject to most of the standards applicable to large quantity generators, continued use of the term "small quantity generator" would have no regulatory significance and would lead to confusion for the previously exempt class of generators.

The proposed redefinition was intended to distinguish between small quantity generators that were conditionally exempt from regulation under § 261.5 (*i.e.*, <100 kg/mo) and those that would be subject to most of the requirements applicable to large quantity generators (*i.e.*, 100-1000 kg/mo). By removing the 100-1000 kg/mo generator from § 261.5 and referring to these generators by their actual quantity limitations, the Agency intended to provide a more explicit, and therefore less confusing, regulatory scheme.

The Agency does not believe that the commenters' suggestion of retaining the term "small quantity generator" solely for 100-1000 kg/mo generators or creating new labels for different categories of small quantity generators

will reduce confusion; such labels would probably cause more confusion, especially where states have established their own small quantity generator definitions and exclusion levels. In fact, as a result of these comments, the Agency believes that the term small quantity generator is no longer sufficiently precise for most regulatory purposes.

For this reason, the Agency is making three regulatory changes affecting the use of the term "small quantity generator". First, the Agency is adding a definition of "small quantity generator" to Section 260.10 as follows:

"Small quantity generator" means a generator who generates less than 1000 kg of hazardous waste in a calendar month.

This definition conforms to the existing definition of the term and is being added to § 260.10 to alleviate any potential confusion over the definition of "small quantity generator".

Second, EPA is finalizing the proposed removal of generators of 100-1000 kg/mo from the conditional exclusion provisions of § 261.5 and will instead refer to these generators in the regulatory language as generators of 100-1000 kg/mo. This will retain the original premise of the redefinition which was to segregate in the regulations those generators that are predominantly exempt from regulation (*i.e.* generators of less than 100 kg/mo of hazardous waste and generators of acutely hazardous waste in less than specified quantities) from those who are more fully regulated (*i.e.* 100-1000 kg/mo generators). Since the 100-1000 kg/mo generators are no longer excluded from most of the Part 262 regulations by inclusion in § 261.5, the applicable portions of Parts 262-266, 270, and 124 will apply to these generators, as proposed.

Finally, the Agency is also modifying references to the term "small quantity generator" in § 261.5 and in other parts of the regulations to provide more explicit descriptions of the various classes of small quantity generator. Thus, generators of less than 100 kg/mo of hazardous waste or less than specified quantities of acutely hazardous waste will also be referred to by their quantity cutoffs or as generators who are conditionally exempt under Section 261.5. Section 261.5 will now be titled "Special Requirements for Hazardous Wastes Generated by Conditionally Exempt Small Quantity Generators."

The removal of the term "small quantity generator" from most regulatory use will in no way preclude continued use of the term "small

quantity generator" for general reference and educational purposes. The Agency recognizes the widespread use of the term "small quantity generator" by States, trade associations, Congress and others and has no intention of interfering with the continued use of that term by anyone choosing to use it to refer to the broad class generating less than 1000 kg in a calendar month. EPA will also continue to use the term "small quantity generator" in describing the collective group of generators below 1000 kg/mo but will use the terms "generators of less than 100 kg/mo" and "100-1000 kg/mo generator" for regulatory purposes. For example, in discussing methodology for counting quantities in order to determine generator status, it would be appropriate to refer to the small quantity generator class since it includes both the 100-1000 kg/mo generators and generators of less than 100 kg/mo.

2. Generator Category Determination

In the Proposal, the Agency discussed a number of issues relevant to making a determination of which generator category a given firm belonged to at any given point in time in order to determine what requirements that establishment was actually subject to. Among the issues covered were which wastes need not be included in quantity determinations (*e.g.*, spent lead-acid batteries destined for reclamation and used oil) and how to count wastes for purposes of determining generator status (*e.g.*, counting of wastes reclaimed on-site). The comments received on these proposed rules raised a variety of additional issues with respect to what types of activities and wastes were intended to be covered by the proposed rules, and whether the rules were applicable to "episodic generators" who might be fully regulated in one month but conditionally exempt the next. These issues are discussed below. In addition to the explanation provided in this preamble, the Agency intends to develop detailed, plain-English guidance and education materials to help the 100-1000 kg/mo generators understand and comply with the hazardous waste regulations.

a. Counting Amendment to § 261.5: In an effort to help clarify for small hazardous waste generators which wastes must be counted in determining their generator category, the Agency proposed an amendment to § 261.5.

The proposed amendment stated that for purposes of making quantity determinations under § 261.5, a generator need not count wastes which are specifically exempted from

regulation (see, e.g., § 261.4, or § 264.1(g) (2), (4), (5) and (6)) or which were not subject to substantive regulation under Parts 263, 264, 265, and the on-site accumulation provisions of § 262.34 were not subject to counting for purposes of determining generator status. Wastes that were subject to the provisions of § 261.6 (b) and (c) (recyclable materials), however, would be required to be counted in making quantity determinations. The proposal was designed to ensure that wastes that are not regulated are not counted. In addition, the counting amendment was intended to eliminate the multiple counting of wastes that are reclaimed and then reused many times during the calendar month. In this situation, the waste would only be counted once, even though it is reused and subsequently becomes a hazardous waste again after such reuse.

While the proposed amendment was intended to make it clear that any hazardous waste that is excluded or exempted from substantive regulation need not be included in the quantity determinations, a number of commenters either misunderstood the scope of the amendment or believed that additional clarification was necessary for the amendment to be understood. Although virtually all commenters on the proposed amendment supported the concept, several recommended specific changes to improve the clarity of the provision. Consequently, the Agency is today finalizing a slightly modified version of the amendment to § 261.5 to clarify which wastes are counted in making generator category determinations.

One commenter correctly noted that the amendment, as written, would not apply to generators of 100-1000 kg/mo since the amendment referred only to the quantity determinations under § 261.5. Since, under the rules being promulgated today, 100-1000 kg/mo generators will no longer be subject to the conditional exclusion provisions of § 261.5, the counting amendment would not have applied to these generators as proposed. Since this was contrary to the Agency's intent that the § 261.5(c) amendment be used by all generators in determining their generator status, the final regulatory language of this provision is modified to indicate that the amendment applies to quantity determinations under Parts 261-266 and 270 of the hazardous waste rules.

A second modification to this provision will make it clear that wastes which are not regulated under Parts 262-266 and 270 are not counted in making quantity determinations.

The majority of commenters on this provision asked for clarification on which wastes or processes were actually intended to be exempted from counting since the references to broad regulatory provisions or concepts such as "subject to substantive regulations" left many readers uncertain as to what the Agency considered to be "substantive regulation". For purposes of this provision, the term "substantive regulation" includes regulations which are directly related to the storage, transportation, treatment, or disposal of hazardous wastes. Regulations which would not be considered "substantive" for purposes of this provision would be requirements to notify and obtain an EPA identification number or to file a biennial report.

As a general guide, the following materials are included in the general category of exempted or excluded wastes that would not be counted in making quantity determinations for purposes of determining hazardous waste generator status:

- Any waste excluded from regulation under § 261.4. For example, wastes discharged to publicly owned treatment works (POTWs) and commingled with domestic sewage are not considered to be solid wastes when discharged, under § 261.4(a). Therefore, they are excluded from regulation under Subtitle C of RCRA and not counted for purposes of making quantity determinations (unless they are stored or treated in regulated units prior to being discharged). Such wastes are regulated instead under the Clean Water Act.²

- Any waste exempt from regulation under § 261.6 or wastes that are not stored or transported prior to being reclaimed. For example, under § 261.6(a)(3)(ii), spent lead-acid batteries that are returned to a battery manufacturer for regeneration are exempt from regulation under Parts 262-266, 270, and 124, and, therefore, are not counted in the quantity determination.

Also, used oil exhibiting a characteristic of hazardous waste, unless mixed with other hazardous wastes, is also currently exempt under § 261.6(a) and is not counted for purposes of making quantity determinations. EPA recently proposed to list used oil as a hazardous waste and

² Waste discharged to a public sewer system is exempted from RCRA to avoid duplicative regulation since such wastes are regulated under the Clean Water Act. While disposal of hazardous wastes in this manner is not a violation of RCRA, the general pretreatment standards under the Clean Water Act contained in 40 CFR 403.5 prohibit the introduction of wastes into POTWs that would interfere with the operation of the treatment plant or subsequent POTW sludge management.

proposed special management standards for used oil that is recycled. (See 50 FR 49164, November 29, 1985.) These proposals, if finalized, will continue to exclude used oil from the quantity determinations of Parts 261-266 and 270. Under the proposed rules for used oil, generators would count their used oil separately from their other hazardous wastes against a separate small quantity generator cutoff that would be established for recycled oil. Under those proposed rules, generators would be subject to less stringent standards for their recycled used oil than for their other hazardous wastes, provided they do not mix other hazardous wastes with their used oils or dispose of the used oil rather than recycle it. Used oil which is disposed of, or mixed with other hazardous wastes, would be regulated like any other hazardous waste and counted separately against the 100 kg/mo cutoff being promulgated today for other hazardous waste generators.

- Any waste reclaimed on-site if it is not accumulated prior to recycling in such a way as to become subject to the accumulation provisions of § 262.34 or the permitting requirements for storage facilities under Parts 264 or 265 (i.e. if it is not accumulated or stored prior to reclamation on-site). Under the hazardous waste rules, the actual process of reclaiming wastes is not subject to regulation under Parts 262-265 and 270 and 124 of the hazardous waste regulations.

Only the accumulation, transportation, long term storage, or the management of residues or sludges resulting from the reclamation process are actually subject to regulation. For example, wastes which are continuously reclaimed in a still or solvent cleaning machine on-site without intervening storage and which are reused on-site are not regulated and are not required to be counted in determining generator status.

- Wastes exempt from regulation under §§ 264.1 or 265.1, provided they are also not subject to the substantive standards in 40 CFR Parts 262 and 263. For example, wastes treated in elementary neutralization units, wastewater treatment units or totally enclosed treatment facilities as these units are defined in § 260.10 are exempt from regulation under Parts 264 and 265.

- Wastes exempt from certain regulations under § 261.4(c). For example, wastes stored in a product or raw material storage tank are not subject to regulation under Parts 262-265, 270, 271, and 124, or to the RCRA 3010 notification requirements, and hence, are not counted.

Therefore, generators are required to count for purposes of determining generator status any waste that is subject to the substantive regulations. Wastes are only counted once, however. A number of commenters claimed that although EPA discussed this in the preamble to the proposed rules, this point was not made clear in the actual regulatory language. The Agency agrees, and thus has added § 261.5(d)(3) to make it clear that a generator need not count the hazardous waste generated and then reclaimed and reused at the site of generation if the hazardous waste has already been included in the monthly totals. The Agency also is modifying § 261.5(d)(2) to make it clear that you only count the residue from treatment where the original hazardous waste was not counted.

The following examples may help to illustrate the regulatory scheme:

(Example 1) Manufacturer A uses solvent in a degreasing process yielding 500 kg of spent solvent in a month. If the solvent is to be reclaimed (e.g., distilled) on-site and is not sorted or accumulated prior to reclamation, it will qualify as a solid (and hazardous) waste but it will not be counted in the generator's monthly totals. The 90 kg of still bottoms from the distillation process are also hazardous waste and must be counted since they were not included in the monthly total. Consequently, "A" will not be a generator of 100-1000 kg during the month in question.

If the solvent is stored or accumulated prior to distillation, the 500 kg of the spent solvent will qualify as a hazardous waste and will be counted in "A's" hazardous waste totals for the month in which it was generated. The still bottoms will also qualify as hazardous waste, but will not be counted because the spent solvents have already been counted once. The regenerated solvent, on the other hand, will not be a solid or hazardous waste. It will remain unregulated, just like the virgin material.

(Example 2) Manufacturer A generates 120 kg of hazardous spent solvent in one month which he distills without intervening storage. The regenerated solvent is then reused. Neither the spent solvent nor the regenerated solvent is counted and "A" is not a 100-1000 kg/mo generator. Alternatively, "A" distills the spent solvent, but stores it for less than 180 days before reclamation, and reuses the regenerated solvent until spent again, and then distills it once again. The spent solvent would be counted because it was stored before reclamation, but it would only be counted once. "A" is now a 100-1000 kg/mo generator. If the spent

solvent were stored for more than 180 days before reclamation, "A" would need a storage permit.

(Example 3) "A" generates 500 kg of hazardous spent solvent in one month and stores it in an earthen basin which is an impoundment, not a tank. The spent solvent is then discharged to a POTW. "A" must count the total quantity of spent solvent, as the impoundment is not a wastewater treatment unit by definition (§ 260.10), and hence, "A" is a 100-1000 kg/mo generator.

(Example 4) An automotive services center generates spent lead-acid batteries, which it sends to a battery breaker. The service center does not count the spent batteries in its monthly total because they are exempt from regulation until they reach the battery breaker. (See § 266.80(a).)

b. Generators of Acutely Hazardous Waste: Section 3001(d)(7) of HSWA states that the requirements applicable to generators of acute hazardous waste listed in §§ 251.31, 261.32, or 261.33(e) are not affected by the HSWA amendments.³ Thus, today's regulatory amendments will not alter those requirements applicable to generators of acutely hazardous wastes and these generators will remain subject to the exclusion limits and requirements contained in § 261.5(e). The same counting rules as those described above are applicable.

c. Generators of Non-acutely Hazardous Waste in Quantities of Less than 100 kg/mo: Section 3001 of HSWA gives EPA authority to promulgate regulations for generators of less than 100 kg of hazardous waste per month if the Administrator determines that such standards are necessary to protect human health and the environment. The Agency is not required to promulgate such regulations and it did not propose to further extend coverage of the hazardous waste program to this class of hazardous waste generator in the August 1, 1985 proposal.

In the Proposal, the Agency stated that it had no data to indicate that additional regulation of generators of less than 100 kg/mo of non-acutely hazardous waste would provide any significant additional level of environmental protection. Generators of less than 100 kg/mo of hazardous waste account for only .07 percent of the total quantity of hazardous waste generated nationally. A review of damage cases also indicated that very few incidents involved quantities below 100 kg. Consequently, none of the regulations

³ At this time, only one acute hazardous waste, dioxin, is listed outside of § 261.33(e).

promulgated today, with one exception, alter the existing § 261.5 provisions applicable to generators of less than 100 kg/mo. As discussed under the on-site accumulation provisions later in this preamble, the Agency has decided to modify § 261.5(g) to subject generators of less than 100 kg/mo who exceed the accumulation limit of 1000 kg to the modified standards for generators of 100-1000 kg/mo rather than to full regulation.

d. Determination of Generator Status: A number of commenters asked for clarification of the requirements that would apply to generators that do not generate hazardous waste at a uniform rate. Such "episodic generators" may generate, for example, less than 100 kg of hazardous waste one month, quantities of 100-1000 kg other months, or may periodically exceed 1000 kg in a single month.

Several commenters requested clarification of what standards would apply to these episodic generators under different circumstances. Various circumstances for which clarification was requested were raised; for example:

(1) A generator that exceeds the 100 kg/mo exclusion level periodically as a result of special operations such as tank cleaning;

(2) A generator that usually generates between 100 and 1000 kg/mo, but exceeds 1000 kg in one month;

(3) A generator that exceeds 1000 kg/mo several times and accumulates all waste in a single tank;

(4) A generator that periodically exceeds 1000 kg/mo and separates the "under 1000 kg/mo" waste from the "over 1000 kg/mo" waste.

The Agency has always taken the position that a generator may be subjected to different standards at different times, depending upon his generation rate in a given calendar month (See, e.g., 45 FR 76620, November 19, 1980). Thus, a generator of less than 100 kg in one calendar month would be deemed a conditionally exempt generator in that month, subject only to the requirements of § 261.5; however, if in the next calendar month, he generates more than 100 kg but less than 1000 kg of any regulated hazardous waste, he is subject to all of the standards being promulgated today, as his generator status has changed. Furthermore, if he generates more than 1000 kg in any calendar month, he is deemed to be a large quantity generator, subject to all applicable standards. Thus, any non-exempt waste that is generated during a calendar month in which the 1000 kg/mo cutoff is exceeded is subject to full regulation until it is removed from the

generator's site. If such fully regulated waste is mixed or combined with waste exempt or excluded from regulation or waste that is subject to reduced regulation under today's final rule, then all of the waste is subject to full regulation until the total mixture is removed from the generator's site. If, on the other hand, the generator stores separately that waste generated during a month in which less than 1000 kg (but more than 100 kg) of hazardous waste is generated, from waste generated during a month in which more than 1000 kg is generated, the former is subject to today's reduced requirements, while the latter is subject to full regulation.

Therefore, generators who expect to periodically exceed the 1000 kg/mo cutoff for the reduced requirements being promulgated today should be prepared to ship their waste off-site if they wish to avoid being subject to full regulation.

Several commenters have suggested alternative schemes for determining applicable standards, all of which the Agency must reject. One commenter suggested that generators would determine their generator status on the basis of a "moving average" over a 12 month period. If, for example, a generator exceeded 1000 kg/mo for several months but averaged between 100 and 1000 kg over the course of the year, he would be subject to the reduced standards being promulgated today for 100-1000 kg/mo generators. The major problem with this approach is that generators would not be able to determine what standards they were subject to until as much as a year after they should have been complying with a specific set of requirements. For example, a generator who generates over 1000 kg the first month but who expects his moving average to fall below 1000 kg after 12 months could avoid preparing a contingency plan or complying with the other requirements of Part 262 applicable to large generators. This would also present enforcement problems, since it would be unclear which standards apply at any given point. Thus, the Agency believes that such an approach would not significantly reduce the implementation difficulties it was designed to address.

The second approach suggested was establishment of a uniform time and quantity cutoff for all generators, applying the same standards to the same quantities, regardless of monthly generation rates. Under this approach, all generators would be allowed to utilize the 180- and 270-day storage periods, provided the 6000 kg "cap" was not exceeded for all accumulated

hazardous wastes so that the reduced standards of Part 262 for 100-1000 kg/mo generators would be extended to all generators who do not exceed 6000 kg on-site.

While this approach would be simpler to administer, it would be inconsistent with the approach that Congress has directed the Agency to take in developing standards for generators who produce different quantities of waste. While the Agency is authorized to consider such factors as small business impacts and management capabilities for 100-1000 kg/mo generators, it is not explicitly authorized to do so for larger generators. The Agency may not ignore in this rulemaking the fact that the statute has established generation rate as a factor in determining whether business impacts may be considered. Thus, as discussed further in Unit III.C.4. below, the Agency may not extend to all generators the same time and quantity limitations applicable to 100-1000 kg/mo generators.

C. Part 262 Generator Responsibilities

EPA is today finalizing amendments to Section 261.5 that will subject hazardous waste generators of 100-1000 kg/mo to the Part 262 generator standards and simplify a number of those requirements. This section of the preamble discusses the proposed amendments to Part 262 to relieve 100-1000 kg/mo generators of some of the administrative burden of complying with the hazardous waste regulatory program, the comments received on each proposal and the Agency's decision with respect to each of the proposed amendments.

The specific Part 262 requirements that EPA is amending for application to 100-1000 kg/mo generators are as follows:

- § 262.20 (General Manifest Requirements) is amended to exempt generators of 100-1000 kg/mo from all manifest requirements if their hazardous waste is reclaimed under certain contractual agreements provided the generator complies with specific recordkeeping requirements set forth in this section. Some modifications to this amendment are being made in response to comments.

- § 262.34 (Accumulation Time) is amended to extend the period of on-site storage allowed for 100-1000 kg/mo generators without the need to obtain interim status or a RCRA permit from 90 days to 180 (or 270) days for quantities not to exceed 6000 kg. In addition, § 262.34 is amended to specify the requirements that would apply to such on-site storage by these generators.

- A new § 262.44 to Subpart D of Part 262 is added to exempt generators of 100-1000 kg/mo from the requirements to file and maintain records of biennial and exception reports. This exemption does not apply to records pertaining to hazardous waste determinations under § 262.40(d) and the extension of retention periods under § 262.40(c).

1. Notification and Identification Number Requirements—§ 262.12

In the August 1 proposal, EPA proposed that generators of 100-1000 kg/mo be subject to § 262.12, which provides that generators not excluded under § 262.10 or the provisions of § 261.5: (1) Must not treat, store, dispose of, transport, or offer for transportation, hazardous waste without receiving an EPA Identification Number; (2) must obtain an EPA identification number (and may do so by completing and submitting EPA form 8700-12); and (3) must not offer their hazardous waste to transporters or to treatment, storage, and disposal facilities that have not received an EPA identification number.

The majority of commenters on the requirement to obtain and use an EPA identification number supported the Agency's proposal not to exempt 100-1000 kg/mo generators from this provision. EPA believes that a centralized data base of firms subject to regulation under RCRA is essential for effective compliance monitoring and enforcement, as well as for characterizing the regulated community to provide information to Congress and to make resource projections. Use of a unique identifying number is necessary to effectively manage any large data base. Several commenters added that requiring identification numbers for all generators who are subject to substantial regulation minimizes confusion in the regulated community.

Commenters who opposed the requirement cited the Agency's cost estimate of \$40.00 per generator to obtain a U.S. EPA Identification Number, the complexity of the application form, and the lack of a specific statutory requirement for Identification Numbers. However, the Agency does not believe that the requirement to obtain a U.S. EPA Identification Number is overly burdensome to these generators, given the important function which this requirement fulfills.

Some commenters who opposed the requirement cited the complexity of the EPA Form 8700-12, "Notification of Hazardous Waste Activity." The Agency does not believe that the form is overly complex. EPA Regional Offices

✓
TO: Stephanie Sorantino
Central Florida District

FROM: Linda Lakes
Hazardous Waste Compliance Section

DATE: 17 March 1992

SUBJECT: Silver Recovery Units

I'm still reviewing the materials from Action Metals and guidance available on silver recovery filters. I will try to finalize a memo in response to your request before the end of the month. Some general comments about what I've found so far:

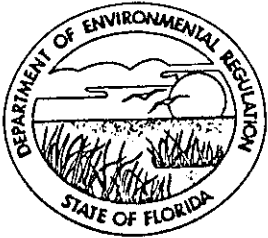
1. Data sent to Michigan DNR for x-ray films, photo paper, etc. are based on EP toxicity testing, not TCLP. EPA guidance from 5/86 indicates x-ray film is usually not hazardous, but reiterates that each generator is responsible for making this determination.

2. Federal Registers discussing possible removal of silver as a toxic characteristic are irrelevant at this point. EPA has been considering this issue for many years, and from the 1990 and 1991 Federal Registers, it doesn't look like they're going to make a change anytime soon.

3. EPA guidance from 1/87 states that chemical recovery cartridges, electrolytic recovery cells, and ion-exchange resins used to recover precious metals are not subject to the hazardous waste regulations when they are sent for reclamation. Per 261.2(c)(3), they would be defined as a sludge and, when sent for reclamation, would not be considered a solid waste.

We're leaning toward the view that if cartridges are sent directly to a reclaimer they are not subject to the hazardous waste regs; if intermediate processing is required prior to reclamation, hazardous waste regs would apply.

I will be out of the office until March 26th; if you have any other information on this issue, please give Mike Redig a call. Thanks.



Florida Department of Environmental Regulation

Twin Towers Office Bldg. • 2600 Blair Stone Road • Tallahassee, Florida 32399-2400

Lawton Chiles, Governor

Carol M. Browner, Secretary

M E M O R A N D U M

TO: SQG County and Regional Planning Council Contacts,

FROM: Glen Perrigan, SQG Program Coordinator *Glen Perrigan*

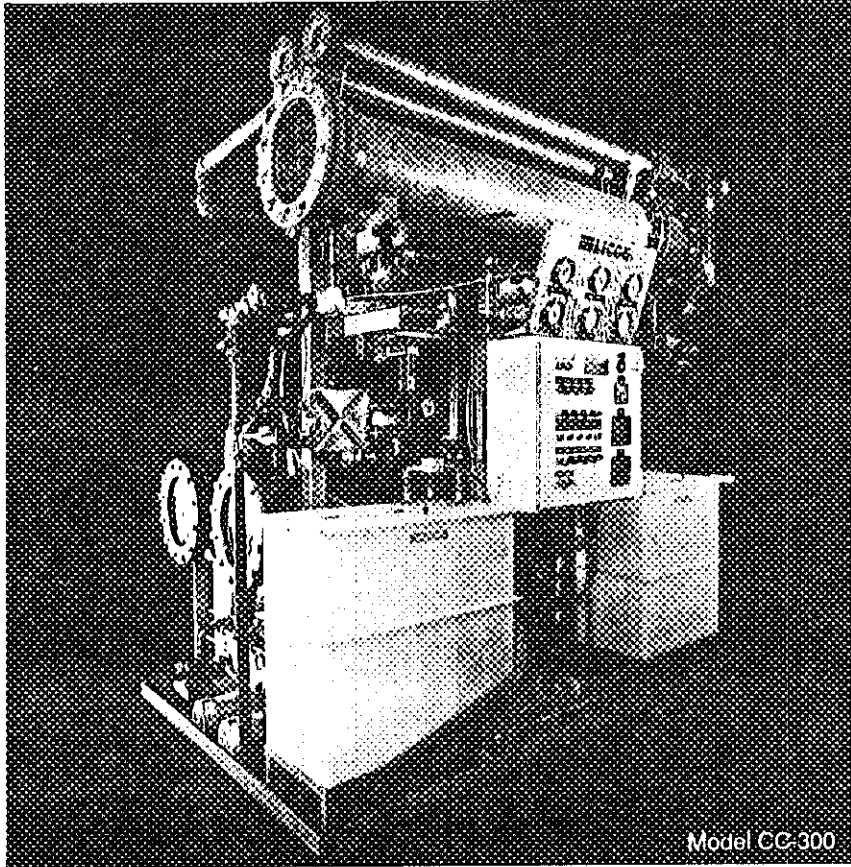
DATE: December 12, 1991

SUBJECT: Photographic/X-Ray Processing Wastes

Photographic/X-ray processing shops produce many solid wastes. Some of these wastes are hazardous wastes. Wastes from these businesses would include spent developer, fixer, and washwater which usually contains hazardous concentrations of silver. Silver-containing wastes are regulated as a hazardous waste (EPA hazardous waste #D011) if there are 5 parts per million (ppm) or more silver as measured by the Toxicity Characteristic Leaching Procedure (TCLP).

According to a 1985 EPA national survey of small quantity generators, 77% of smaller generators discharge these wastes to sewer or septic systems. Doctors, dentists, hospitals, medical clinics, newspapers, print and photographic shops, and others discharging photographic/X-ray processing wastes into the sewage treatment system should be aware that many localities restrict or prohibit this form of waste disposal. These businesses should immediately contact their local sewer authority to determine if it is permissible to discharge their waste chemicals into the sewer.

Businesses should never discharge untreated photographic/X-ray processing wastes into a septic system. Such discharge of photochemicals would be expected to damage the septic system and ultimately contaminate groundwater. This type of discharge is also illegal.



SINGLE EFFECT DOUBLE EFFECT TWIN EVAPORATORS

LICON's high vacuum SINGLE EFFECT, DOUBLE EFFECT, and TWIN evaporators use conventional climbing film evaporative principles in a patented horizontal tube arrangement. This combined with LICON's patented titanium Bayonet Augmented Tube (BAT) bundle and industrial plastics construction, provide reliable, compact, state of the art evaporation.

The **Double Effect** unit requires half the energy of the SINGLE EFFECT. The TWIN system processes two different waste streams, maintaining chemical separation, yet only using the energy required by a single unit. Although less energy efficient than other LICON designs, these systems offer a lower capital investment alternative. Evaporative capacities range from 5 to 1000 GPH.

Variety of Applications

Can be used on virtually any aqueous waste stream.

Alcohols like ethanol and methanol have been successfully separated.

Metal recovery such as chrome, nickel, cadmium, zinc, copper, as well as the concentration of shampoo, boric acid, soy bean oil, glycol, water soluble oil . . .

Versatile Design

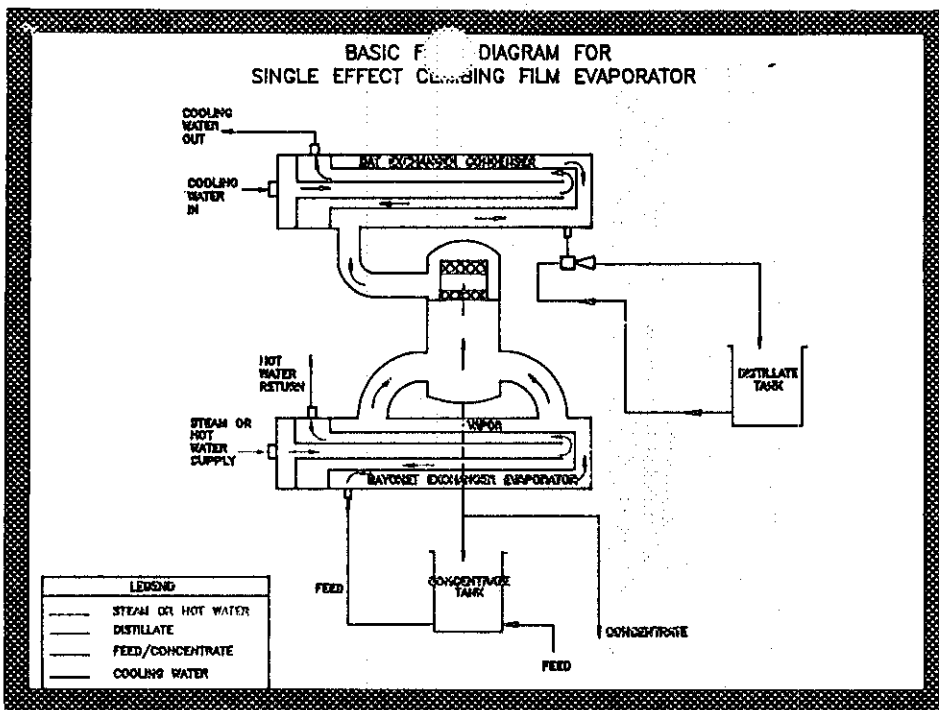
All LICON evaporators are skid-mounted with external surge and monitoring tanks included on the skid, and large sight windows for operator viewing ease.

Conventional design for industries with steam, hot water or virtually **any waste heat** source.

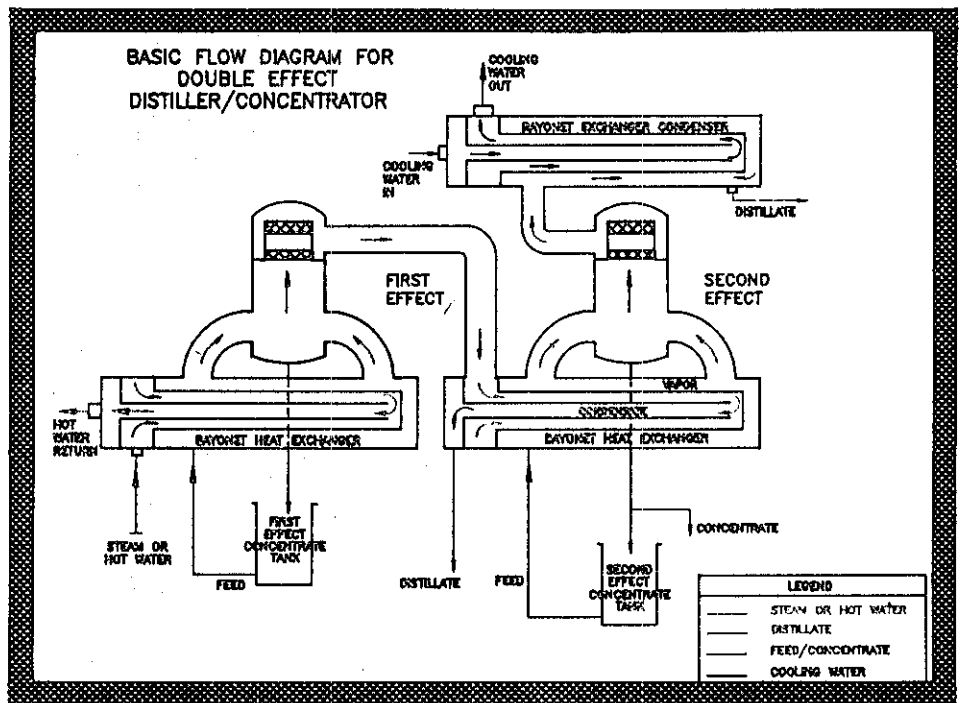
Can be coupled to a freon heat pump for an all-electric alternative.

Verified Results

Production of clean, distilled water of generally 5 ppm or less. High concentrations of waste or reusable by-product to as high as 500,000 ppm.



Single effect evaporators use approximately 10,000 BTU's per gallon of water evaporated (feed heating included). Double effect evaporators use approximately 5,000 BTU's per gallon of water evaporated. Single effect evaporators evaporate a gallon of water for \$.07 and the double effect for \$.035.



MODEL *	SIZE (LXWXH)	MODEL *	SIZE (LXWXH)
C-5	4'8" x 2' 6" x 6'0"	CC-45	8'0" x 5' 0" x 8'0"
C-10	6'8" x 2' 8" x 6'4"	CC-90	8'4" x 5' 6" x 8'4"
C-30	7'9" x 3' 0" x 8'4"	CC-120	8'6" x 5' 8" x 8'6"
C-50	8'0" x 3' 9" x 8'4"	CC-200	8'6" x 6' 6" x 9'0"
C-90	8'6" x 4' 0" x 8'6"	CC-300	9'6" x 6' 6" x 10'4"
C-150	8'6" x 4' 6" x 8'6"	CC-500	9'6" x 7' 0" x 10'8"
C-200	9'0" x 5' 0" x 8'10"	CC-1000	10'0" x 8' 0" x 11'6"
C-350	9'0" x 5' 6" x 9'0"		

1,2 kW/H gas oper.
11 1/2 kW/H elect.

*Model # reflects evaporative rate in GPH,
ie: C-5 is a 5 GPH SINGLE EFFECT evaporator.

CHEMICAL POLLUTION CONTROL Inc.

For A Safer Environment

20 SOUTH FOURTH STREET

BAY SHORE, N.Y. 11706

(516) 586-0333

FAX: 586-0727

April 1, 1992

Photographic Waste Control
1943 High Street
Longwood, FL 32750

Attention: Accounts Payable

Dear Sir/Madam:

Chemical Pollution Control, Inc. having reviewed your analysis, MSDS and information submitted to us has determined that we have the capabilities to dispose of these materials in accordance with all Federal, State and local regulations. We respectfully submit the following quotation for the removal and disposal of the following chemical waste:

<u>DESCRIPTION</u>	<u>WASTE CODE #</u>	<u>PRICE</u>
Photo Sludge (D011)		\$250.00 per drum

WORK CANNOT PROCEED UNTIL WE HAVE A SIGNED COPY OF THIS AGREEMENT.

SPECIAL CONDITIONS

Any material not meeting analysis specifications, will be reanalyzed and disposal prices will be determined upon analysis completion.

Analysis must be updated once per year as per Chemical Pollution Control's written waste analysis plan submitted to the EPA as required by Federal regulations promulgated in "40 CFR Section 264.13 General Waste Analysis."

Please be advised that Chemical Pollution Control, Inc. offers a complete waste management program including consulting and laboratory services.

We direct your attention to the General Terms and Conditions below. If you have any questions concerning this quote or have any other chemical disposal problems, please feel free to contact customer service at the above number.

By signed acceptance of this quotation, you hereby acknowledge that you have read and agreed to all of the General Terms and Conditions following:

GENERAL TERMS AND CONDITIONS

1. ACCEPTANCE:

Acceptance of this proposal must be made within thirty days and without qualifications. CHEMICAL POLLUTION CONTROL, INC. will not be bound by any different or additional terms and conditions in this acceptance or otherwise, except as agreed by CHEMICAL POLLUTION CONTROL, INC. in writing.

2. PAYMENT:

You will pay CHEMICAL POLLUTION CONTROL, INC. the amount specified in our quotation dated April 1, 1992. Billing for disposal services will be made immediately upon removal. Terms will be NET 10 DAYS ___ or COD ___. All payments shall be made to CHEMICAL POLLUTION CONTROL, INC., 120 South Fourth Street, Bay Shore, NY 11706. Any tax, other than Federal, State or local income taxes imposed by any present or future law on the services or on the use of the materials used by CHEMICAL POLLUTION CONTROL, INC. under this proposal shall be added to the price as stated. A charge of 1½% of your unpaid invoice will be added to your account after 30 days.

3. INDEMNITY BY CHEMICAL POLLUTION CONTROL, INC.:

CHEMICAL POLLUTION CONTROL, INC. operates pursuant to permits obtained from all agencies having jurisdiction over CHEMICAL POLLUTION CONTROL'S operations. All processing and disposal by CHEMICAL POLLUTION CONTROL, INC. is done in accordance with all applicable rules and regulations.

CHEMICAL POLLUTION CONTROL, INC. also has in place all insurance, both vehicular and environmental as required by State and Federal regulations concerning the shipment and storage of hazardous waste. This includes environmental liability insurance.


4. RESPONSIBILITY OF CUSTOMER:

All waste submitted for processing and disposal shall be in conformity with the sample which you have submitted to CHEMICAL POLLUTION CONTROL, INC. and/or as described in our quotation. Drums must be tightly capped and free from leaks in order to be removed. CHEMICAL POLLUTION CONTROL, INC. will transfer the contents of damaged drums at an additional charge. All chemical waste are available at locations suitable for loading. Any container, vehicles or other equipment belonging or being utilized by you or for you in connection with the waste will be suitable for such use and in good order and repair. You shall be responsible for all damages, direct and indirect, which may result from any material submitted for processing and the sample referred to above and shall defend indemnify and save CHEMICAL POLLUTION CONTROL, INC. harmless from and against any cost, expense or liability caused directly from the specifications of the sample. CHEMICAL POLLUTION CONTROL, INC. reserves the right to reject any waste which is outside the specifications of the sample or at its option, to submit a surcharge representing increased cost incurred in processing such non-conforming waste.

WORK CANNOT PROCEED UNTIL SITE HAS A SIGNED AGREEMENT AND A SIGNED COPY OF GENERATOR'S WASTE PROFILE SHEET, IF ATTACHED.

For A Safer Environment

CHEMICAL POLLUTION CONTROL, INC.


Al Hoffman
President

AH:jp

GENERATOR:

Photo graphics waste control Inc

BY: Bar R. Amoreli

TITLE: owner

DATE: 4-1-90

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MARKETSOUTH
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ADMARK GROUP
393 WHOOPING LOOP
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PENACOLI & ASSOCIATES
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ALTAMONTE SPGS FL 32701

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355 E ALTAMONTE DR # 170
ALTAMONTE SPGS FL 32701

K O CINE PRODUCTIONS
125 ROBIN RD # C
ALTAMONTE SPGS FL 32701

MEDIA DEPARTMENT PLUS
462 WINDMEADOWS CIR
ALTAMONTE SPGS FL 32701

TALON ADVERTISING OF ORL
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ALTAMONTE SPGS FL 32701

1-HOUR PHOTO DRIVE THRU
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ALTAMONTE SPGS FL 32701

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ALTAMONTE SPGS FL 32701

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661 E ALTAMONTE DR
ALTAMONTE SPGS FL 32701

CATHY LAVALLEE
OB-GYN CONSULTANTS OF FL
934 E ALTAMONTE DR
ALTAMONTE SPGS FL 32701

PAUL D AXFORD MD
685 PALM SPRINGS DR
ALTAMONTE SPGS FL 32701

ORLANDO NEUROSURGICAL AS	BENJAMIN J NEWMAN MD	661 E ALTAMONTE DR # 115	ALTAAMONTE SPGS FL 32701
ALTAAMONTE SPGS FL 32701	NEWMAN FAMILY MEDICINE G	661 E ALTAMONTE DR # 115	ALTAAMONTE SPGS FL 32701
661 E ALTAMONTE DR	DON M PREBLE DDS	ORAL PLASTIC SURGERY ASS	499 CRANES ROOST BLVD
ALTAAMONTE SPGS FL 32701	PAULINE GRAY MD	350 MAITLAND AVE	ALTAAMONTE SPGS FL 32701
OCTAVIUS MC GILL MD	N M S REHABILITATION-ORLAN	115 BOSTON AVE	ALTAAMONTE SPGS FL 32701
350 MAITLAND AVE	ALTAAMONTE SPGS FL 32701	ALTAAMONTE SPGS FL 32701	ALTAAMONTE SPGS FL 32701
SEMINOLE MENTAL HEALTH	F J SELTZER	SELTZER CHIROPRACTIC CLI	741 MAITLAND AVE
ALTAAMONTE SPGS FL 32701	ALTAAMONTE SPGS FL 32701	ALTAAMONTE SPGS FL 32701	ALTAAMONTE SPGS FL 32701
417 WHOOPING LOOP	EDWARD ZIFFMAN	ADOLESCENT HEALTH CARE-F	475 OSCEOLA ST # 1100
ALTAAMONTE SPGS FL 32701	ALTAAMONTE SPGS FL 32701	ALTAAMONTE SPGS FL 32701	ALTAAMONTE SPGS FL 32701
597 MAITLAND AVE	JONATHAN STONE	STONE CHIROPRACTIC CENTE	2527 E SEMORAN BLVD
ALTAAMONTE SPGS FL 32701	ALTAAMONTE SPGS FL 32701	ALTAAMONTE SPGS FL 32701	ALTAAMONTE SPGS FL 32701
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321 MAITLAND AVE	ALTAAMONTE SPGS FL 32701	ALTAAMONTE SPGS FL 32701	ALTAAMONTE SPGS FL 32701
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LYNN HENDERSON	R E BALLENTINE	PSYCH SERVICES INC	631 PALM SPRINGS DR
RADIATION THERAPY CONSUL	ALTAAMONTE SPGS FL 32701	ALTAAMONTE SPGS FL 32701	ALTAAMONTE SPGS FL 32701
631 PALM SPRINGS DR	RICHARD T BECK MD	311 MAITLAND AVE	ALTAAMONTE SPGS FL 32701
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ROBERT J MAC MURRAY MD	GLENN J DI BARTOLOMEO DD	590 PALM SPRINGS DR	ALTAAMONTE SPGS FL 32701
631 PALM SPRINGS DR	FRANK SZOLOSZY MD	608 E SEMORAN BLVD	ALTAAMONTE SPGS FL 32701
ALTAAMONTE SPGS FL 32701	ALTAAMONTE SPGS FL 32701	ALTAAMONTE SPGS FL 32701	ALTAAMONTE SPGS FL 32701
631 PALM SPRINGS DR	EMMA RUIZ	INFECTIOUS DISEASE CONSU	685 PALM SPRINGS DR # 2A
ALTAAMONTE SPGS FL 32701	ALTAAMONTE SPGS FL 32701	ALTAAMONTE SPGS FL 32701	ALTAAMONTE SPGS FL 32701
631 PALM SPRINGS DR	HOWARD A OSER DDS	703 E MAGNOLIA DR	ALTAAMONTE SPGS FL 32701
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ROBERT J MAC MURRAY MD	HUMPHREY H GREER DDS	321 MAITLAND AVE	ALTAAMONTE SPGS FL 32701
631 PALM SPRINGS DR	DENNIS R WARD MD	HUNT CLUB ELECTROLYSIS	201 MAITLAND AVE # A
ALTAAMONTE SPGS FL 32701	ALTAAMONTE SPGS FL 32701	ALTAAMONTE SPGS FL 32701	ALTAAMONTE SPGS FL 32701
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610 JASMINE RD	608 E ALTAMONTE DR	665 PALM SPRINGS DR	ALTAAMONTE SPGS FL 32701
ALTAAMONTE SPGS FL 32701	ALTAAMONTE SPGS FL 32701	ALTAAMONTE SPGS FL 32701	ALTAAMONTE SPGS FL 32701
JOSE T BORRERO MD	ALTAAMONTE SPGS FL 32701	ALTAAMONTE SPGS FL 32701	ALTAAMONTE SPGS FL 32701

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FLORIDA SKIN CLINIC
106 BOSTON AVE # 202
ALTAMONTE SPGS FL 32701

IA LEWIS
FLORIDA EYE CLINIC
160 BOSTON AVE
ALTAMONTE SPGS FL 32701

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631 PALM SPRINGS DR
ALTAMONTE SPGS FL 32701

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FLORIDA HEMATOLOGY & ONC
601 E ALTAMONTE DR
ALTAMONTE SPGS FL 32701

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608 MAITLAND AVE
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ALMONT MALL DENTAL SPEC
ALTAMONTE MALL UPPER LEV
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ALLERGY & ASTHMA ASSOCIA
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ALTAMONTE SPGS FL 32701
CATHY TEEFY
ALTAMONTE DIAGNOSTIC GEN
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ALTAMONTE SPGS FL 32701

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ALLERGY ASTHMA SPECIALIS
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ALTAMONTE SPGS FL 32701
VICKI CLAUS
ALLERGY IMMUNOLOGY SPECI
685 PALM SPRINGS DR
ALTAMONTE SPGS FL 32701

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EAR NOSE & THROAT ASSOCI
107 THE HERMITS TRL
ALTAMONTE SPGS FL 32701
DAVID H LEBIODA MD
DIGESTIVE DISEASE CONSUL
661 E ALTAMONTE DR
ALTAMONTE SPGS FL 32701

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TYPESETTING CO
107 CONCORD DR
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893 E SEMORAN BLVD
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1015 E SEMORAN BLVD
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128 STATE RD 436
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BLUE LINE GRAPHICS & PRI
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1548 SEMINOLA BLVD
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NATURE'S PATH MEDICAL CL
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CASSELBERRY FL 32707

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PRAKASH & SAOJI
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MARC E OTTENGA DDS
2911 RED BUG LAKE RD
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WILLIAM M SILVERMAN D
LAKE HOWELL FAMILY MEDIC
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MICHAEL BARIMO DO
MAITLAND-CASSELBERRY FML
1120 SEMORAN BLVD
CASSELBERRY FL 32707

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CASSELBERRY FL 32707

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CASSELBERRY FL 32707

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515 E SEMORAN BLVD # C
CASSELBERRY FL 32707

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SEMORAN ALLERGY CLINIC I
1120 SEMORAN BLVD
CASSELBERRY FL 32707

SEMINOLE DENTAL CENTER
879 E SEMORAN BLVD
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SEMORAN HEARING CLINIC
1120 SEMORAN BLVD
CASSELBERRY FL 32707

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935 SEMORAN BLVD
CASSELBERRY FL 32707

CHRISTOPHER CONAVAY MD
CONAVAY FAMILY MEDICINE
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CASSELBERRY FL 32707

DEEP AGEE DDS
400 E SEMORAN BLVD
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HARRY J GOLDSCHHEIN DDS
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2911 RED BUG LAKE RD
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500 E SEMORAN BLVD # 12
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1120 N SEMORAN BLVD
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RUBEN OCASIO-FERRER MD 225 S WESTMONTE DR ALTAMONTE SPGS FL 32714	RONALD L BEHNER DDS 934 E HWY 436 ALTAMONTE SPGS FL 32714	ROBERT W MC FADDEN DDS 695 DOUGLAS AVE ALTAMONTE SPGS FL 32714
PATRICK ST GERMAIN ST GERMAIN CHIROPRACTIC 719 S ORANGE BLOSSOM TRL ALTAMONTE SPGS FL 32714	CANDY FELSKI SOUTH SEMINOLE DIAGNOSTI 769 DOUGLAS AVE ALTAMONTE SPGS FL 32714	JAMES URBACH MD RYAN & URBACH 659 DOUGLAS AVE ALTAMONTE SPGS FL 32714
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MICHAEL E KAYE 851 W STATE RD 436 # 104 ALTAMONTE SPGS FL 32714	PRAFULLA K KIRTANE MD 210 N WESTMONTE DR ALTAMONTE SPGS FL 32714	KANNIKA CHUTINAN MD PEDIATRIC ASSOCIATES-FLO 800 N HIGHWAY 434 ALTAMONTE SPGS FL 32714
PATRICK L DEL FLORE DDS 901 DOUGLAS AVE ALTAMONTE SPGS FL 32714	CANDEN KNIGHT SURGICAL CENTER FOR OBES 683 DOUGLAS AVE ALTAMONTE SPGS FL 32714	JOSEPH A DEKLEVA DDS 151 WYMORE RD ALTAMONTE SPGS FL 32714

ALDREY & ASTHMA ASSOCIA 793 DOUGLAS AVE ALTLAMONTE SPGS FL 32714	ALTLAMONTE DENTAL ASSOCIA 195 S WESTMONTE DR ALTLAMONTE SPGS FL 32714	ADULT MEDICINE SPECIALIS 220 N WESTMONTE DR # B ALTLAMONTE SPGS FL 32714
ALAN M GUY DDS 1149 DOUGLAS AVE ALTLAMONTE SPGS FL 32714	ALAN B KINGSTON DDS 101 WILLOW AVE ALTLAMONTE SPGS FL 32714	MICHAEL J FROYD ALTLAMONTE-LONGWOOD CHIRO 675 DOUGLAS AVE ALTLAMONTE SPGS FL 32714
BARRY A LEVIN DDS 820 N HIGHWAY 434 ALTLAMONTE SPGS FL 32714	BIRTH CONTROL CENTER 455 DOUGLAS AVE # 2255 ALTLAMONTE SPGS FL 32714	BRADFORD W PORTER DDS 1097 DOUGLAS AVE ALTLAMONTE SPGS FL 32714
ANN KIESEL ALTLAMONTE ALLERGY ASSOCI 220 N WESTMONTE DR # D ALTLAMONTE SPGS FL 32714	AMID HABIB MD 789 DOUGLAS AVE ALTLAMONTE SPGS FL 32714	BENJAMIN S MC KENDALL B S MC KENDALL MD 789 DOUGLAS AVE ALTLAMONTE SPGS FL 32714
WILLIAM P WEBB II WEBB CHIROPRACTIC CLINIC 195 S WESTMONTE DR ALTLAMONTE SPGS FL 32714	WEKIVA FAMILY PRACTICE 100 LAKE SHORE DR ALTLAMONTE SPGS FL 32714	BRUCE S BEVITZ MD WOMAN'S HEALTH SPECIALIS 901 DOUGLAS AVE # D ALTLAMONTE SPGS FL 32714
T DWIGHT BARRON DDS 885 DOUGLAS AVE ALTLAMONTE SPGS FL 32714	VALENTIN E RAZ MD 165 MONTGOMERY RD ALTLAMONTE SPGS FL 32714	WAYNE M BENNETT DDS 840 N HIGHWAY 434 ALTLAMONTE SPGS FL 32714
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JAMES J MACCOOL MD 919 W STATE RD 436 ALTLAMONTE SPGS FL 32714	LEVINE CHIROPRACTIC LIFE 1088 E HWY 436 ALTLAMONTE SPGS FL 32714	L D COLEMAN DDS 697 DOUGLAS AVE ALTLAMONTE SPGS FL 32714
JAMES KASER DDS GREENBERG DENTAL ASSOCIA 990 N HIGHWAY 434 ALTLAMONTE SPGS FL 32714	C WILLIAM D'AIUTO DDS 197 MONTGOMERY RD ALTLAMONTE SPGS FL 32714	R COVERMAN MD ALANDREA FOR SKIN CARE 220 N WESTMONTE DR # A ALTLAMONTE SPGS FL 32714
DENNIS R GROSS MD 165 MONTGOMERY RD ALTLAMONTE SPGS FL 32714	HOWARD S BUCHOFF MD 681 DOUGLAS AVE ALTLAMONTE SPGS FL 32714	HOWARD I FINER MD 974 DOUGLAS AVE ALTLAMONTE SPGS FL 32714
IMPLANT DENTISTRY OF MID 11 DOUGLAS AVE ALTLAMONTE SPGS FL 32714	DAVID BENNETT GAY & GAY 9 DOUGLAS AVE # B ALTLAMONTE SPGS FL 32714	MANUEL FARIA CHIROPRACTIC PHYSICIAN C 195 S WESTMONTE DR ALTLAMONTE SPGS FL 32714

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CENTRA CARE MEDICAL CENT
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ALTAMONTE SPGS FL 32714

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CENTRAL FLORIDA COSMETIC
901 DOUGLAS AVE # 100
ALTAMONTE SPGS FL 32714

CA IN COLLINS JR MD
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817 DOUGLAS AVE # 179
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PANITDA TOOCHINDA MD
CHILDREN'S DOCTORS OFFIC
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2905 LAKEVIEW DR
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LAKE MARY FL 32746

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LAKE MARY FL 32746

DIPLOMAT DENTAL GROUP
3809 LAKE EMMA RD
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FLORIDA INTERNAL MEDICIN
706 W LAKE MARY BLVD
LAKE MARY FL 32746

FELIX A NAVARRO JR MD
130 W LAKE MARY BLVD
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JIM KOFFERNUS
FLORIDA INTERNAL MED
549 W LAKE MARY BLVD
LAKE MARY FL 32746

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ST CLOUD FL 34769

ST CLOUD FL 34769

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4121 NEPTUNE RD
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2912 17TH ST
ST CLOUD FL 34769

JEE SANG KWON MD
1118 PENNSYLVANIA AVE
ST CLOUD FL 34769

JOSEPH R HENSCHEN DDS
1205 PENNSYLVANIA AVE
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2900 17TH ST
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ST CLOUD FL 34769

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5770 W I BRONSON HWY
KISSIMMEE FL 34746

7586 W IRLO BRONSON MEMO
KISSIMMEE FL 34746

HOCUS FOCUS
5463 W IRLO BRONSON MEMO
KISSIMMEE FL 34746

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KISSIMMEE FL 34746

535 WALK-IN MEDICAL CENT
2926 VINELAND RD
KISSIMMEE FL 34746

FAMILY PRACTICE ASSOCIAT
3309 S ORANGE BLOSSOM TR
KISSIMMEE FL 34746

POINCIANA PRESS
7 DOVERPLUM AVE
KISSIMMEE FL 34759

CLAIRE PALMIERI
CARDIOVASCULAR ASSOCS
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ST CLOUD FL 34769

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1600 BUDINGER BLVD
ST CLOUD FL 34769

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JERRY M ALSTOTT MD CENTRAL FLORIDA FAMILY 641 W LAKE MARY BLVD LAKE MARY FL 32746	CENTRAL FLORIDA RADIOLOG 706 W LAKE MARY BLVD LAKE MARY FL 32746	C D MILTENBERGER MD 130 W LAKE MARY BLVD # 1 LAKE MARY FL 32746
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RION J FORCONI MD 130 W LAKE MARY BLVD LAKE MARY FL 32746	UROLOGY CENTER 706 W LAKE MARY BLVD LAKE MARY FL 32746	GARY L TORRES DDS TORRES & HOCHFELEB 641 W LAKE MARY BLVD # 1 LAKE MARY FL 32746
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HORIZON DENTAL 345 W LAKE MARY BLVD LAKE MARY FL 32746	MARY BATES GASTROENTEROLOGY ASSOCIA 706 W LAKE MARY BLVD LAKE MARY FL 32746	BRUCE E WALTON MD 340 W LAKE MARY BLVD LAKE MARY FL 32746
MASTERS CHIROPRACTIC 345 W LAKE MARY BLVD LAKE MARY FL 32746	ZANE G KALTER MD LAKE MARY PEDIATRICS 706 W LAKE MARY BLVD # 3 LAKE MARY FL 32746	MICHAEL BEIM DDS 130 W LAKE MARY BLVD LAKE MARY FL 32746
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667 HIGHWAY 427 S
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KISSIMMEE FL 34744	KISSIMMEE FL 34744	KISSIMMEE FL 34744
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FAMILY DENTAL CARE	CINDY DIGAN	J MICHAEL LAYTON DDS
1321 E VINE ST	EYE SURGERY CENTER	2901 E IRLB BRONSON MEMO
KISSIMMEE FL 34744	711 E OAK ST	KISSIMMEE FL 34744
KISSIMMEE FL 34744	KISSIMMEE FL 34744	KISSIMMEE FL 34744
ACUPUNCTURE CENTER	ABDUL R MAMSA MD	YATES CHIROPRACTIC ASSOC
1900 BOGGY CREEK RD	809 E OAK ST	806 N MAIN ST
KISSIMMEE FL 34744	KISSIMMEE FL 34744	KISSIMMEE FL 34744
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KISSIMMEE FL 34744	800 N MAIN ST	KISSIMMEE FL 34744
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KISSIMMEE FL 34744	KISSIMMEE FL 34744	KISSIMMEE FL 34744
SOUTH ORLANDO DENTAL ASS	RALPH TOOMBS DDS	KARAMALI BANDEALI MD
809 E OAK ST	OSCEOLA DENTAL ASSOCIATE	OSCEOLA ARTHRITIS CENTER
KISSIMMEE FL 34744	2200 E IRLB BRONSON MEMO	255 SIMPSON RD
KISSIMMEE FL 34744	KISSIMMEE FL 34744	KISSIMMEE FL 34744
MICHAEL E REGAN DDS	TINA PHILLIPS MD	MARC X
2543 BOGGY CREEK RD	FAMILY PRACTICE ASSOCIAT	2430 MARC CT
KISSIMMEE FL 34744	1504 OSCEOLA BLVD	KISSIMMEE FL 34744
KISSIMMEE FL 34744	KISSIMMEE FL 34744	KISSIMMEE FL 34744

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OSCEOLA CARDIOPULMONARY
201 W HILDA ST
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KISSIMMEE FL 34741

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MYLES S DOUGLAS MD
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PETER J CASELLA MD
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KISSIMMEE FL 34741

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KISSIMMEE FL 34741

M ANWARUL HOQUE MD
201 HILDA ST # 15
KISSIMMEE FL 34741

JULIETA T SANTOS MD
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KISSIMMEE FL 34741

LE ROI K PRICE MD
201 W HILDA ST
KISSIMMEE FL 34741

M GLEN MAYO MD
201 W HILDA ST # 13
KISSIMMEE FL 34741

M SIRAJ ISLAM MD
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KISSIMMEE FL 34741	KISSIMMEE FL 34741	KISSIMMEE FL 34741
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KISSIMMEE FL 34741	KISSIMMEE FL 34741	KISSIMMEE FL 34741
JOHN TAGGART MD	JOHN O RAO MD	JOSEPH A SHIRER MD
201 HILDA ST	503 W VERONA ST	411 W OAK ST
KISSIMMEE FL 34741	KISSIMMEE FL 34741	KISSIMMEE FL 34741
ROSE QUINTANA	FRANCIS B JANARIOUS MD	FRANK T CRESPO MD
FAMILY PRACTICE ASSOCIAT	801 W OAK ST	818 W OAK ST
431 W OAK ST	KISSIMMEE FL 34741	KISSIMMEE FL 34741
KISSIMMEE FL 34741	KISSIMMEE FL 34741	KISSIMMEE FL 34741
GILBERTO PEREZ MD	GOPEN N MUKHERJEE MD	FRANK R DAVIS DDS
327 W CYPRESS ST	201 HILDA ST # 22	820 EMMETT ST
KISSIMMEE FL 34741	KISSIMMEE FL 34741	KISSIMMEE FL 34741
C MICHAEL TURNER DDS	PREM N TANDON MD	GEORGE R MOSKOWITZ MD
1200 N CENTRAL AVE # 213	201 W HILDA ST	1200 CENTRAL AVE
KISSIMMEE FL 34741	KISSIMMEE FL 34741	KISSIMMEE FL 34741
PAM LORENZ	ALONZO J LOGAN MD	BENJAMIN O CAMPO MD
CARDIOVASCULAR ASSOCIATE	102 PARK PLACE BLVD	101 PARK PLACE BLVD
801 W OAK ST	KISSIMMEE FL 34741	KISSIMMEE FL 34741
KISSIMMEE FL 34741	KISSIMMEE FL 34741	KISSIMMEE FL 34741
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800 N CENTRAL AVE	CENTRAL FLORIDA DISEASE	CENTRAL FLORIDA SPORTS M
KISSIMMEE FL 34741	325 W CYPRESS ST	720 OAK COMMONS BLVD
KISSIMMEE FL 34741	KISSIMMEE FL 34741	KISSIMMEE FL 34741
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810 N ROSE AVE	801 W OAK ST	201 HILDA ST
KISSIMMEE FL 34741	KISSIMMEE FL 34741	KISSIMMEE FL 34741
KISSIMMEE FL 34741	KISSIMMEE FL 34741	KISSIMMEE FL 34741

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CENTRAL FLORIDA UROLOGY
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380 N WICKHAM RD
MELBOURNE FL 32935

ALL SERVICE GRAPHICS INC
1270 LAKE WASHINGTON RD
MELBOURNE FL 32935

GOOD IMPRESSIONS PRINTIN
1696 AURORA RD
MELBOURNE FL 32935

SNODGRASS PRINTING CO IN
690 W EAU GALTIE BLVD
MELBOURNE FL 32935

SIR SPEEDY PRINTING CTR
1529 N HARBOR CITY BLVD
MELBOURNE FL 32935

ACTION QUICK PRINT
1684 N HARBOR CITY BLVD
MELBOURNE FL 32935

LONG PRINTING
2715 N HARBOR CITY BLVD
MELBOURNE FL 32935

KOPY KAT PRINTING
448 N HARBOR CITY BLVD
MELBOURNE FL 32935

AARDVARK CUSTOM PRINTING
2885 ELECTRONICS DR
MELBOURNE FL 32935

ACCURATE PROFESSIONAL TV
478 BALLARD DR # 30
MELBOURNE FL 32935

ACCENT GRAPHICS
722 SAINT CLAIR ST
MELBOURNE FL 32935

SOUTHERN PHOTO SUPPLY
249 N BARCOCK ST
MELBOURNE FL 32935

P K G'S PACKAGING & SEND
2451 N WICKHAM RD
MELBOURNE FL 32935

PAUL R BARKER DESIGNER
1467 GUAVA AVE
MELBOURNE FL 32935

1 HOUR PHOTO
2098 SARNO RD
MELBOURNE FL 32935

BECKER STUDIO
1404 HIGHLAND AVE
MELBOURNE FL 32935

60 MINUTE DEVELOPING INC
202 N HARBOR CITY BLVD
MELBOURNE FL 32935

ART & DESIGN
1900 AURORA RD
MELBOURNE FL 32935

ECKERD EXPRESS PHOTO
1954 N WICKHAM RD
MELBOURNE FL 32935

SPEAR AGENCY MARKETING C
1462 GUAVA AVE
MELBOURNE FL 32935

CHAMPION ART STUDIO
1803 N WICKHAM RD
MELBOURNE FL 32935

R J SANDERS DDS
1751 SARNO RD
MELBOURNE FL 32935

GREGORY C PRIEST

JAMES C LOVE DDS

RUSSELL F VANN DDS

DAVID ROSNER DDS
1325 S PINE ST
MELBOURNE FL 32901

LE S RYON MD
1301 S HICKORY
MELBOURNE FL 32901

CC MED
720 E NEW HAVEN AVE
MELBOURNE FL 32901

CARDIOLOGY ASSOCIATES
1351 S HICKORY ST
MELBOURNE FL 32901

RICHARD B MOORE MD
CARDIOLOGY ASSOCIATES
1351 S HICKORY ST
MELBOURNE FL 32901

CHRISTINE MC CARTY MD
201 E SHERIDAN RD
MELBOURNE FL 32901

CAROL PALLADINO
CONSUMERS' DENTAL CARE C
811 S BABCOCK ST
MELBOURNE FL 32901

RAJIV CHANDRA MD
COMPREHENSIVE MEDICAL CA
2202 BABCOCK ST
MELBOURNE FL 32901

DOWNTOWN CHIROPRACTIC CL
800 E MELBOURNE AVE
MELBOURNE FL 32901

FRANCIS S POOSER MD
1301 S HICKORY
MELBOURNE FL 32901

JOHN WALDEN MD
FLORIDA EYE CARE INC-MEL
719 E NEW HAVEN AVE
MELBOURNE FL 32901

H L ALLEN MD
201 E HIBISCUS BLVD
MELBOURNE FL 32901

HENRY N NELSON MD
1318 S PINE ST
MELBOURNE FL 32901

H S SIMMONS DDS
1937 CENTRAL BLVD
MELBOURNE FL 32901

FLORIDA EYE CARE ADMIN O
708 E NEW HAVEN AVE
MELBOURNE FL 32901

JOHN CARTER
E N T HEALTH & SURGICAL
1281 S HICKORY ST # C
MELBOURNE FL 32901

DUANE L SEIG MD
1305 S HICKORY
MELBOURNE FL 32901

F EDWARD TENEWITZ MD
1601 S APOLLO BLVD
MELBOURNE FL 32901

N BREZE
FAMILY DENTISTRY
2103 S BABCOCK ST
MELBOURNE FL 32901

F L REMARK MD
301 E SHERIDAN RD
MELBOURNE FL 32901

BASIL THEODOTOU MD
1601 S APOLLO BLVD
MELBOURNE FL 32901

ADLEY SEDAROS MD
25 E SILVER PALM AVE
MELBOURNE FL 32901

BELINDA E DICKINSON MD
1325 S APOLLO BLVD
MELBOURNE FL 32901

BREVARD ANESTHESIA SERVI
1304 S OAK ST
MELBOURNE FL 32901

DEBBIE COCAVESSIS
BREAST CENTER OF SOUTH B
1331 S VALENTINE ST
MELBOURNE FL 32901

ADVANCED MEDICAL DIAGNOS
1051 S HICKORY ST # K
MELBOURNE FL 32901

ASAD SHAMMA MD
1402 OAK ST
MELBOURNE FL 32901

ATHAN P KARTSONIS MD
1355 S HICKORY ST # 101
MELBOURNE FL 32901

ARTHROSCOPY KNEE CLINIC
330 E HIBISCUS BLVD
MELBOURNE FL 32901

VICTOR C APEL DDS
AMERICAN DENTAL HEALTH C
1514 S BABCOCK ST
MELBOURNE FL 32901

ANTHONY J INSERILLO MD
1314 S PINE ST
MELBOURNE FL 32901

ERNEST MORRIS MD
BREVARD HAND CENTER
205 E NASA BLVD
MELBOURNE FL 32901

BRUCE E ALBER MD
930 S HARBOR CITY BLVD #
MELBOURNE FL 32901

BREWARD CHIROPRACTIC CEN 812 E STRAWBRIDGE AVE MELBOURNE FL 32901	CHARLOTTE DEUBLE CARDIOTHORACIC SURGICAL 1601 S APOLLO BLVD MELBOURNE FL 32901	THOMAS E ROSE MD CARDIOLOGY SPECIALISTS 1281 S HICKORY ST # E MELBOURNE FL 32901
THOMAS W SWAIN MD CARDIOLOGY ASSOCIATES 1351 S HICKORY ST MELBOURNE FL 32901	KATHY QUINN BREWARD DERMATOLOGY CTR 17 E SILVER PALM AVE MELBOURNE FL 32901	FAITH TYNDALL BREWARD ALLERGY ASSOCS 335 E SHERIDAN RD MELBOURNE FL 32901
SCOTT SEMINAR BREWARD GASTROINTESTINAL 21 W FEE AVE # D MELBOURNE FL 32901	BREWARD SPINE CENTER BREWARD SPINE CENTER 21 W FEE AVE # D MELBOURNE FL 32901	MIKE YUKNUS BREWARD MEDICAL CENTERS 200 E HIBISCUS BLVD MELBOURNE FL 32901
BREWARD EYE CENTER 205 E NASA BLVD # 201 MELBOURNE FL 32901	STEPHEN BORSANYI MD MELBOURNE EAR CLINIC 1208 S HARBOR CITY BLVD MELBOURNE FL 32901	LEE BODENDORFER MELBOURNE NEUROLOGIC 1317 S OAK ST MELBOURNE FL 32901
STEVEN HOOK MELBOURNE DENTURE SERVIC 1405 S VALENTINE ST MELBOURNE FL 32901	MELBOURNE KIDNEY CENTER 1400 S APOLLO BLVD MELBOURNE FL 32901	MELBOURNE CHIRO CLINIC 3150 S BARCOCK ST # L1 MELBOURNE FL 32901
JAMES M RONALDSON M MEDICAL SPECIALISTS 2202 S BARCOCK ST # 204 E FL 32901	FARIDEH RADFAR MELBOURNE WALK IN CLINIC 316 E STRAWBRIDGE AVE MELBOURNE FL 32901	KRAUS CHIROPRACTIC CLINI 1520 S BARCOCK ST MELBOURN
MARC ALFANT DDS 729 E STRAWBRIDGE AVE MELBOURNE FL 32901	R CHANDRA MD MEDICAL SPECS & CONSULTA 2202 S BARCOCK ST # 204 MELBOURNE FL 32901	MARGARET C RANK MD 1430 S VALENTINE ST MELBOURNE FL 32901
STEPHEN HORNETT MD MELBOURNE DERMATOLOGY 333 E SHERIDAN RD MELBOURNE FL 32901	CHRISTOPHER PRUSINSKI DO NEURO DIAGNOSTIC CENTER 1499 S HARBOR CITY BLVD MELBOURNE FL 32901	MERRILL & RINALDI CHIROP 2323 S BARCOCK ST MELBOURNE FL 32901
NUCLEAR MEDICINE ASSOCIA 1900 S HARBOR CITY BLVD MELBOURNE FL 32901	PARVESH BANSAL MD 1400 PINE ST MELBOURNE FL 32901	OBSTETRICS & GYNECOLOGY 1330 S PINE MELBOURNE FL 32901
TAMMY BENNETT MELBOURNE CARDIAC REHAB 930 S HARBOR CITY BLVD # MELBOURNE FL 32901	JAY E OLSSON DO MELBOURNE REHABILITATION 101 E FLORIDA AVE MELBOURNE FL 32901	MOLLY SUTHERLAND MELBOURNE EYE ASSOCIATES 1355 S HICKORY ST # 202 MELBOURNE FL 32901
JANIE HUNT MELBOURNE PSYCHIATRY 109 E SILVER PALM AVE MELBOURNE FL 32901	MARK BRIMER MELBOURNE ORTHOPAEDIC 706 E NASA BLVD MELBOURNE FL 32901	PHILIP PIAESCKI MELBOURNE INTERNAL MEDIC 200 E SHERIDAN RD MELBOURNE FL 32901

INTERNAL MEDICINE CLINIC 333 W COCOA BEACH CSWY 4301 N BANANA RIVER BLVD
333 W COCOA BEACH CSWY COCOA BEACH FL 32931 COCOA BEACH FL 32931
COCOA BEACH FL 32931

GLEN P MUSSELMAN MD BERNARD H MC LAUGHLIN MD LAIRD C QUENZLER MD
333 W COCOA BEACH CSWY 333 W COCOA BEACH CSWY BEACH OPTICIANS
COCOA BEACH FL 32931 COCOA BEACH FL 32931 503 N ORLANDO AVE # 102
COCOA BEACH FL 32931

MARILYN VESCIO BRADLEY SCHIFF DDS JANICE GREEN
BREVARD CARDIOLOGY GROUP 1980 N ATLANTIC AVE # 90 ABEL GLASNER & VON THRON
455 MINUTEMEN CSWY COCOA BEACH FL 32931 COCOA BEACH FL 32931
COCOA BEACH FL 32931

WILLIAM M QUINTER DDS ANTONIO CATASUS MD ADEL T FAHMY MD
117 N ORLANDO AVE 80 WOODLAND AVE 150 E COLUMBIA LN
COCOA BEACH FL 32931 COCOA BEACH FL 32931 COCOA BEACH FL 32931

BURK PHILLIPS PODNOS & W COURTENAY MEDICAL CENTER COSMETIC DENTISTRY STUDI
COCOA BEACH FL 32931 2003 N ATLANTIC AVE 503 N ORLANDO AVE
COCOA BEACH FL 32931 COCOA BEACH FL 32931

DAVID K ROSS DDS DALE B ADAMSON MD CHARLES A THOMAN JR MD
30 N WOODLAND AVE 5490 N ATLANTIC AVE 15 N ORLANDO AVE
COCOA BEACH FL 32931 COCOA BEACH FL 32931 COCOA BEACH FL 32931

JEFFREY ARAJ MD LORI DOMINGUES J B ADAMSON MD
CENTRAL FL ELECTROLYSIS COCOA BEACH DERMATOLOGY CLINICAL PATHOLOGY LAB
1325 N ATLANTIC AVE BLDG 333 COCOA BEACH CSWY 5490 N ATLANTIC AVE
COCOA BEACH FL 32931 COCOA BEACH FL 32931 COCOA BEACH FL 32931

L R WELLS MD SANTIAGO LEYTE-VIDAL MD ROBERT M DEEB MD
2210 S ATLANTIC AVE 465 MINUTEMEN CSWY 150 E COLUMBIA LN
COCOA BEACH FL 32931 COCOA BEACH FL 32931 COCOA BEACH FL 32931

RICHARD N BETZ MD SHARON FAHMY DDS JANET P GRIFFIN
37 N BREVARD AVE 150 E COLUMBIA LN TURNER & MUIR
COCOA BEACH FL 32931 COCOA BEACH FL 32931 1980 N ATLANTIC AVE # 52
COCOA BEACH FL 32931

TIM ELLIS DDS THOMAS D WILLIAMS DDS BOB PEREIRA DC
485 MINUTEMEN CSWY 112 DIXIE LN PEREIRA BOB
COCOA BEACH FL 32931 COCOA BEACH FL 32931 350 N ATLANTIC AVE
COCOA BEACH FL 32931

MICHAEL R ZIGAN DDS PATRICK B MC KEE MD MARCO A LEYTE-VIDAL DDS
495 MINUTEMAN CAUSEWAY 100 N ORLANDO AVE 465 MINUTEMEN CSWY
COCOA BEACH FL 32931 COCOA BEACH FL 32931 COCOA BEACH FL 32931

L WAYNE BORREX DDS BURGESS OF COCOA BEACH HARRIS CONTROUS & GYPSUM

HUGO R DUJOVNE MD
700 E MELBOURNE AVE
MELBOURNE FL 32901

CHAEEL MEANS
HOLMES REGIONAL MEDICAL
1350 S HICKORY ST
MELBOURNE FL 32901

IRVING SIL KELLER MD
2202 S BABCOCK ST # 200
MELBOURNE FL 32901

JOE M CREEL DDS
100 W NEW HAVEN AVE
MELBOURNE FL 32901

J K PATEL MD
1331 S VALENTINE ST
MELBOURNE FL 32901

SUE HAYES
HOLMES REGIONAL HEALTHCA
1035 S APOLLO BLVD
MELBOURNE FL 32901

J SLATTERY
HICKORY ASSOCIATES
1101 W HIBISCUS BLVD # 2
MELBOURNE FL 32901

JOANNE TOSCA
HICKORY DIAGNOSTIC CENTE
1051 S HICKORY ST # F
MELBOURNE FL 32901

HOLMES REGIONAL HEALTHCA
1350 S HICKORY ST
MELBOURNE FL 32901

HOLMES REGIONAL HEALTHCA
1051 S HICKORY ST # A
MELBOURNE FL 32901

HOLMES REGIONAL HEALTHCA
1333 GATEWAY DR
MELBOURNE FL 32901

JOHN C TURSE MD
1341 S HICKORY ST #111
MELBOURNE FL 32901

JOSEPH A GURRI MD
1318 S PINE ST
MELBOURNE FL 32901

JOSE RUIZ MD
1324 S VALENTINE ST
MELBOURNE FL 32901

JOSEPH L COLLINS MD
116 SILVER PALM AVE
MELBOURNE FL 32901

KIMBERLY A BRACKETT DDS
1302 E NEW HAVEN AVE
MELBOURNE FL 32901

JUAN A PEREZ-BALBOA MD
1506 S APOLLO BLVD
MELBOURNE FL 32901

JONATHAN T PAINE MD
1305 S VALENTINE ST
MELBOURNE FL 32901

JOHN G MADRY JR MD
1341 S HICKORY
MELBOURNE FL 32901

JOHN L JACKSON MD
1355 S HICKORY
MELBOURNE FL 32901

JOHN M GAYDEN JR MD
1251 S HICKORY ST
MELBOURNE FL 32901

JOHN HERMANDSORFER MD
1251 S HICKORY ST
MELBOURNE FL 32901

JOHN H POTOMSKI JR DO
720 E NEW HAVEN AVE
MELBOURNE FL 32901

FLAMINGO PRINTING INC
PO BOX 188
MELBOURNE FL 32902

PAPERS UNLIMITED
INDIALANTIC FL 32903

M J B ENTERPRISES
112 MARS CT
INDIALANTIC FL 32903

ECKERD EXPRESS PHOTO
818 N HIGHWAY A1A
INDIALANTIC FL 32903

MEDIA SERVICES
134 5TH AVE
INDIALANTIC FL 32903

STACKIG SANDERSON & WHIT
134 5TH AVE
INDIALANTIC FL 32903

MELBOURNE DIRECT ADVERTI
1220 N HIGHWAY A1A # 4
INDIALANTIC FL 32903

JOSEPH R CWIKLA DDS
404 5TH AVE
INDIALANTIC FL 32903

JOHN L WEARE MD
233 6TH AVE
INDIALANTIC FL 32903

JULIAN SAXE MD
230 5TH AVE
INDIALANTIC FL 32903

THOMAS T GARELL MD	JOHN M BRODNAN MD	GARY NAWROCKI DDS
EDDIE V MERCADO MD	EUGENE HADDEN MD	HEMATOLOGY & ONCOLOGY CO
1980 N ATLANTIC AVE	HADDEN HARLOW & RADU	455 MINUTEMEN CSWY
COCOA BEACH FL 32931	333 W COCOA BEACH CSWY	COCOA BEACH FL 32931
FORNES CHIROPRACTIC LIFE	ELLIOT KORNBURG MD	JOSEPH C SUTLY MD
1675 N ATLANTIC AVE	1980 N ATLANTIC AVE	1980 N ATLANTIC AVE
COCOA BEACH FL 32931	COCOA BEACH FL 32931	COCOA BEACH FL 32931
1ST PHOTO STUDIO	JANUARY & ASSOCIATES	FERYDOON KHOSHNOOD MD
2021 N ATLANTIC AVE	85 S ATLANTIC AVE	30 WOODLAND AVE
COCOA BEACH FL 32931	COCOA BEACH FL 32931	COCOA BEACH FL 32931
PROMAIL	MAILBOXES ETC	WALGREENS DRUG STORES
3670 N ATLANTIC AVE	2023 N ATLANTIC AVE	4150 N ATLANTIC AVE
COCOA BEACH FL 32931	COCOA BEACH FL 32931	COCOA BEACH FL 32931
BRIGHT IDEAS GRAPHIC DES	ECKERD EXPRESS PHOTO	ECKERD EXPRESS PHOTO
12 HARBOR CIR	140 CANAVERAL PLZ	2063 N ATLANTIC BLVD
COCOA BEACH FL 32931	COCOA BEACH FL 32931	COCOA BEACH FL 32931
HEARTBEAT OF BREVARD	MARKETING INTELLIGENCE I	SURF & SUN
1980 N ATLANTIC AVE # 13	3000 N ATLANTIC AVE # 20	5700 N ATLANTIC AVE
COCOA BEACH FL 32931	COCOA BEACH FL 32931	COCOA BEACH FL 32931
JET PRESS	GRAPHIC TYPESETTING & DE	B & B REPRODUCTIONS
266 N ATLANTIC AVE	41 N ORLANDO AVE	51 N ORLANDO AVE
COCOA BEACH FL 32931	COCOA BEACH FL 32931	COCOA BEACH FL 32931
GARY E BAUM	BREWARD HEALTH IMAGING S	JOHN G CAREY MD
3935 N US HIGHWAY 1	3815 N US HIGHWAY 1	4360 N US HIGHWAY 1
COCOA FL 32926	COCOA FL 32926	COCOA FL 32927
BREWARD MEDICAL GROUP-CO	ORLANDO SENTINEL	APPLIED GRAPHICS
1317 WESTPOINT DR	PO BOX 1951	3815 N US HIGHWAY 1 # 28
COCOA FL 32922	COCOA FL 32923	COCOA FL 32926
STANLEY A BEBERMAN MD	VILLAGE INTERNAL MEDICIN	CHRISTOPHER MARLETTE DDS
BREWARD OB/GYN ASSOC	503 DELANNOY AVE	96 WILLARD ST # 102
1075 N US HIGHWAY 1	COCOA FL 32922	COCOA FL 32922
COCOA FL 32922	COCOA FL 32922	COCOA FL 32922
COCOA FL 32922	15 POINSETT DR # A	1119 STATE RD 520

THOMAS P LUEDERKE LUEDEKE CHIROPRACTIC GEN 200 S SHANNON AVE INDIALANTIC FL 32903	LOUIS C POSTMA DDS 112 4TH AVE INDIALANTIC FL 32903	GLEN WAGNER MD GLEN WAGNER MD 121 6TH AVE INDIALANTIC FL 32903
WILLIAM J EELTS DDS COMFORT DENTAL SVCS OF B 228 8TH AVE INDIALANTIC FL 32903	ARLAND A ADAMS MD INDIALANTIC FL 32903	E SCOTT BELL DDS 1001 S SHANNON AVE INDIALANTIC FL 32903
EDWARD F BAINES DDS DOTTIE KOEHLER FAMILY PRACTICE OF BREVIA 140 6TH AVE INDIALANTIC FL 32903	EDWARD F BAINES DDS INDIALANTIC FL 32903	PLO M SIAN MD 143 6TH AVE INDIALANTIC FL 32903
MICHAEL YUKNUS BREVARD MEDICAL CENTERS 2194 N HIGHWAY A1A # 103 MELBOURNE FL 32903	ATLANTIS WOMEN'S HEALTH 2194 N HIGHWAY A1A # 101 MELBOURNE FL 32903	DOUGLAS P SORENSEN MD 200 MICHIGAN AVE MELBOURNE FL 32903
SPACE COAST PEDIATRICS 2194 N HIGHWAY A1A # 201 MELBOURNE FL 32903	MARLENE ABLE HEALTH CARE ASSOCIATES 1790 N HIGHWAY A1A # 110 MELBOURNE FL 32903	DEBRA HELTON ATLANTIS DIAGNOSTIC CENT 2194 N HIGHWAY A1A # 303 MELBOURNE FL 32903
ROBERT R CALLAHAN DDS 241 6TH AVE INDIALANTIC FL 32903	RICHARD K TRAUT DDS 337 6TH AVE INDIALANTIC FL 32903	SAMUEL D LONGLEY DDS 225 5TH AVE INDIALANTIC FL 32903
VINEET MEHTA 105 N PALM AVE INDIALANTIC FL 32903	T MICHAEL MC HENRY DDS 404 5TH AVE INDIALANTIC FL 32903	SCOTT S LITHO 700 S JOHN RODES BLVD # MELBOURNE FL 32904
PRINTS PLUS 1700 W NEW HAVEN AVE # 1 MELBOURNE FL 32904	C & S PRINTING 115 W HICKORY ST MELBOURNE FL 32904	AMERICAN SPEEDY PRINTING 3026 W NEW HAVEN AVE MELBOURNE FL 32904
TRI-CO SCREEN PRINTING 7608 CORAL DR MELBOURNE FL 32904	INTERNATIONAL MINUTE PRE 1954 DAIRY RD MELBOURNE FL 32904	PRINT SHACK 2893 W NEW HAVEN AVE MELBOURNE FL 32904
PARAGON PRINTING & GRAPH 2110 S DAIRY RD MELBOURNE FL 32904	EXCEL PRINTING 575 S WICKHAM RD # F MELBOURNE FL 32904	INK BLOT PRINTING & COPY 1128 S WICKHAM RD MELBOURNE FL 32904
WALGREENS DRUG STORES 1700 W NEW HAVEN AVE MELBOURNE FL 32904	ECKERD EXPRESS PHOTO 41 W NEW HAVEN AVE MELBOURNE FL 32904	MAIL MANAGEMENT SERVICES 2 VERMONT ST MELBOURNE FL 32904

6200 N ATLANTIC AVE
CAPE CANAVERAL FL 32920

102 COLUMBIA DR
CAPE CANAVERAL FL 32920

A 1 A FAMILY DENTAL CARE
102 COLUMBIA DR
CAPE CANAVERAL FL 32920

SUNSTATE PREVENTIVE MEDI
707 MULLET DR
CAPE CANAVERAL FL 32920

LINDA MEEKS
PORT CANAVERAL MEDICAL C
677 GEORGE KING BLVD # 1
CAPE CANAVERAL FL 32920

EDWARD J WEISS DDS
7001 N ATLANTIC AVE
CAPE CANAVERAL FL 32920

CANAVERAL CHIROPRACTIC C
6811 N ATLANTIC AVE
CAPE CANAVERAL FL 32920

CHARLES W PINDZIAK DO
6099 N ATLANTIC AVE
CAPE CANAVERAL FL 32920

TECH SET GRAPHICS INC
141 S VARR AVE
COCOA FL 32922

VILLAGE PRINTING
801 FORREST AVE
COCOA FL 32922

BREVARD PRINTING & BUS F
150 S VARR AVE
COCOA FL 32922

BREVARD RUBBER STAMP & P
151 S VARR AVE
COCOA FL 32922

LEE COMPANY OF FLORIDA I
116 FORREST AVE
COCOA FL 32922

A S A P PRINT & PAPER
1633 N US HIGHWAY 1
COCOA FL 32922

GRAPHICS ART PRINTING SE
817 DIXON BLVD
COCOA FL 32922

J W GRAPHICS PLUS
15 MAGNOLIA ST
COCOA FL 32922

SOUTHERN TAPE & LABEL
1107 PEACHTREE ST
COCOA FL 32922

SUN RAY T-SHIRTS
105 BREVARD AVE
COCOA FL 32922

BRIGHT IDEAS GRAPHIC STD
315 BREVARD AVE # 6
COCOA FL 32922

CALDERONE AGENCY
105 1/2 HARRISON ST
COCOA FL 32922

ADVERTISING RESULTS INC
96 WILLARD ST
COCOA FL 32922

BREVARD PHOTO SUPPLY
1147 BYRD PLAZA MALL
COCOA FL 32922

AD PLUS
814 DIXON BLVD
COCOA FL 32922

ECKERD EXPRESS PHOTO
1068 CLEARLAKE RD
COCOA FL 32922

GENERAL COLOR CORP
604 BREVARD AVE
COCOA FL 32922

WALGREENS DRUG STORES
1155 BYRD PLZ
COCOA FL 32922

OCCUPATIONAL MEDICINE AS
7 N COCOA BLVD
COCOA FL 32922

PAUL B THOMPSON MD
96 WILLARD ST # 106
COCOA FL 32922

R H MANDUS DDS
941 DIXON BLVD
COCOA FL 32922

D SCALERA DDS
JOEL C SCALERA & ASSOCIA
1400 DIXON BLVD
COCOA FL 32922

HARRY M CARPENTER MD
640 BREVARD AVE
COCOA FL 32922

IMPLANT DENTISTRY OF BRE
1400 DIXON BLVD
COCOA FL 32922

JAMES E ANDERSON DDS
502 BREVARD AVE
COCOA FL 32922

GERARD W BIRD DDS

RUBEN SCHULER MD

ROBIN TAY

MAIL CENTER
1883 W NEW HAVEN AVE
MELBOURNE FL 32904

AGE PRODUCTIONS CORP
2815 W NEW HAVEN AVE
MELBOURNE FL 32904

TRACTS OF SOUTH BREVAR
711 JOHN ADAMS LN
MELBOURNE FL 32904

ATLANTIC PHOTO LAB
2870 HARPER RD
MELBOURNE FL 32904

C P I ONE HOUR PHOTO FIN
MELBOURNE SQUARE MALL
MELBOURNE FL 32904

CREATIVE IMAGES & CONSULT
2815 W NEW HAVEN AVE
MELBOURNE FL 32904

JOHN FUSSELMAN & ASSOCIA
1813 W NEW HAVEN AVE
MELBOURNE FL 32904

JANICE G WAHL DDS
1221 S WICKHAM RD
MELBOURNE FL 32904

JOHN VISO MD
3238 W NEW HAVEN AVE
MELBOURNE FL 32904

MARILYN MOSS MD
W MELBOURNE FAMILY CTR
230 S WICKHAM RD
MELBOURNE FL 32904

JOHN P POMPURA DDS
3018 W NEW HAVEN AVE
MELBOURNE FL 32904

JOHN T BAILEY DDS
917 S WICKHAM RD
MELBOURNE FL 32904

ATLANTIC ORTHODONTIC ASS
MELBOURNE SQUARE PROMENA
MELBOURNE FL 32904

DEBBIE JONES
AFFORDABLE DENTALAND DEN
1700 W NEW HAVEN AVE
MELBOURNE FL 32904

EFFIE K BLUE DDS
BLUE & BLUE
575 S WICKHAM RD # D
MELBOURNE FL 32904

CASEY CHIROPRACTIC CENTE
1938 S DAIRY RD
MELBOURNE FL 32904

CHARLES O GRIFFITH DDS
1121 S WICKHAM RD
MELBOURNE FL 32904

ELIZABETH KONDRACKA MD
964 S WICKHAM RD
MELBOURNE FL 32904

JAMES E GREATHOUSE
WEST MELBOURNE CHIROPRACTIC
1589 S WICKHAM RD
MELBOURNE FL 32904

SARA KEELER
FAMILY MEDICAL CARE
2501 W NEW HAVEN AVE
MELBOURNE FL 32904

LINDA CONNOR
PEDIATRICS OF BREVARD
3002 W NEW HAVEN AVE
MELBOURNE FL 32904

PREGNANCY RESOURCES INC
110 BRY LYNN DR
MELBOURNE FL 32904

PHYSICIANS WEIGHT LOSS C
2104 W NEW HAVEN AVE
MELBOURNE FL 32904

MAGELLAN BOOK CO
4700 BABCOCK ST NE # 18
PALM BAY FL 32905

KWIK COPY PRINTING
1975 PALM BAY RD NE
PALM BAY FL 32905

CREATIVE IMAGES
2003 ROC ROSA DR NE
PALM BAY FL 32905

PRESTO QUALITY PRINTING
2280 HARRIS AVE NE
PALM BAY FL 32905

TOUCH OF CLASS PRINTING
4711 BABCOCK ST NE # 11
PALM BAY FL 32905

WOLFPACK INC
1501 ROBERT J CONLAN BLV
PALM BAY FL 32905

PRINT MASTERS
2951 HESSEY AVE NE
PALM BAY FL 32905

P I P PRINTING
5275 BABCOCK ST NE # 16
PALM BAY FL 32905

AMERICAN SPEEDY PRINTING
4700 BABCOCK ST NE
PALM BAY FL 32905

MAIL PLUS
5275 BABCOCK ST NE # 11
PALM BAY FL 32905

PALM BAY FL 32905
5200 BARCOCK ST NE
PALM BAY FL 32905

CLOW CHIROPRACTIC OFFICE
2280 HARRIS AVE NE # 6
PALM BAY FL 32905
CHARLES A SARLO JR DDS
5201 BARCOCK ST NE # 6
PALM BAY FL 32905
CHILDREN'S MEDICAL CENTE
5200 BARCOCK ST NE # 103
PALM BAY FL 32905

C CRAIG HENRY DDS
2186 HARRIS AVE NE # 3
PALM BAY FL 32905
EDWARD F BAINES DDS
4670 LIPSCOMB ST NE
PALM BAY FL 32905
DIANE P JONES DDS
4690 LIPSCOMB ST NE # 5
PALM BAY FL 32905

CHARLES W BARGER DDS
2155 PALM BAY RD NE
PALM BAY FL 32905
EUGENE F WAWRZYNIAK MD
1051 PORT MALABAR BLVD N
PALM BAY FL 32905
BREWARD MEDICAL CENTERS
4888 BARCOCK ST NE
PALM BAY FL 32905

BHASKER P PATEL MD
2174 HARRIS AVE NE # 1A
PALM BAY FL 32905
APARNA KOPURI MD
BREWARD CHILD GUIDANCE C
4400 DIXIE HWY NE # 201
PALM BAY FL 32905

BREWARD OB-GYN SPECS
5200 BARCOCK ST NE # 101
PALM BAY FL 32905
A & P TENORIO CO
314 CAROL DR NE
MELBOURNE FL 32907
TENORIO CO
314 CAROL DR NE
MELBOURNE FL 32907

C & G INC
110 OLIVICK CIR NE
MELBOURNE FL 32907
RESPONSE MEDIA
3935 HIELD RD NW
MELBOURNE FL 32907
SPEEDY PAC
160 MALABAR RD SW
MELBOURNE FL 32907

WALGREENS DRUG STORES
190 MALABAR RD SW
MELBOURNE FL 32907
SPACE COAST ORTHOPEDIC
1155 MALABAR RD NE # 10
MELBOURNE FL 32907
WEST PALM BAY CHIROPRACT

HEALTH CARE ASSOCIATES-B
190 MALABAR RD SW # 105
MELBOURNE FL 32907
PERDUE CHIROPRACTIC CENT
160 MALABAR RD SW # 110
MELBOURNE FL 32907
ROBERT LOVE MD
1155 MALABAR RD NE
MELBOURNE FL 32907

MARLENE ABLE
HEALTH CARE ASSOCIATES
1155 MALABAR RD NE # 13
MELBOURNE FL 32907
SIGN DESIGN & SCREEN PRI
1728 AGORA CIR SE # A
MELBOURNE FL 32909
JESSE M LACY
DITTMER CHIROPRACTIC OFF
111 ENTERPRISE AVE SE
MELBOURNE FL 32909

JOHN F WARSCHNER DDS
3085 JUPITER BLVD SE
MELBOURNE FL 32909
WILLIAM T WATSON III
RAY L POLLOCK & ASSOC
6050 BARCOCK ST SE # 2
MELBOURNE FL 32909
COLOR PRINTERS OF BREVAR
110 POLK AVE # 1
CAPE CANAVERAL FL 32920

2186 HARRIS AVE NE # 2
PALM BAY FL 32905

PALM BAY FL 32905

PALM BAY FL 32905

JOHN HARTLEY
SONOMETRIC CENTER INC
5200 BABCOCK ST NE # 106
PALM BAY FL 32905

ROCIO M DOYLE MD
1452 BELLAIRE LN NE
PALM BAY FL 32905

RAYMOND A ARMSTRONG MD
5200 BABCOCK ST NE
PALM BAY FL 32905

RUTH M BRAZIE MD
2155 PALM BAY RD NE # 2
PALM BAY FL 32905

VASCONI CLINIC OF CHIRO
4670 BABCOCK ST NE # 1
PALM BAY FL 32905

WAYNE KEARNEY DDS
2179 JULIAN AVE NE
PALM BAY FL 32905

PETER W KLEIN DDS
5201 BABCOCK ST NE # 8
PALM BAY FL 32905

MARY DOYLE
PERINATAL CENTER
5200 BABCOCK ST NE
PALM BAY FL 32905

R K DAS MD
1071 PORT MALABAR BLVD N
PALM BAY FL 32905

BRAD EMERSON
RADIOLOGY ASSOCIATES-BRE
5200 BABCOCK ST NE # 107
PALM BAY FL 32905

R W MC REE DDS
4670 LPSCMB NE UNIT 13
PALM BAY FL 32905

MARK A FIGURA DDS
IMPLANT DENISTRY OF FLOR
2105 PALM BAY RD NE
PAL

HOLMES REGIONAL HEALTHCA
5200 BABCOCK ST NE
PALM BAY FL 32905

MARC D SHAPIRO MD
1571 ROBERT J CONLAN BLV
PALM BAY FL 32905

MARK S COICAN DDS
2179 JULIAN AVE NE
PALM BAY FL 32905

MARK J URBAN DDS
2061 PALM BAY RD NE
PALM BAY FL 32905

DOTIIE KOEHLER
FAMILY PRACTICE OF BREVA
5200 BABCOCK ST NE # 105
PALM BAY FL 32905

GEORGE HOOP DDS
FAMILY DENTAL SERVICES I
5205 BABCOCK ST NE
PALM BAY FL 32905

FAMILY MEDICAL SERVICES
1091 PORT MALABAR BLVD N
PALM BAY FL 32905

FRANK P FILIBERTO M
HEARING CENTER
2020 PALM BAY RD NE
PALM BAY FL 32905

FLORIDA DIAGNOSTIC IMAGI
5201 BABCOCK ST NE # 5
PALM BAY FL 32905

SHERYL CORVELLO
MELBOURNE EYE ASSOCIATES
5240 BABCOCK ST NE
PALM BAY FL 32905

GARY WEISS MD
NEURO DIAGNOSTIC CENTER
1051 PORT MALABAR BLVD #
PALM BAY FL 32905

NEURO IMAGING INSTITUTE
1571 ROBERT J CONLAN BLV
PALM BAY FL 32905

CHRISTOPHER PRUSINSKI DO
NEURO DIAGNOSTIC CENTER
1051 PORT MALABAR BLVD N
PALM BAY FL 32905

JOHN T DAVIDSON MD
PALM BAY ORTHOPAEDICS
1571 ROBERT J CONLAN BLV
PALM BAY FL 32905

DINAH BEVERLY
OSLER MEDICAL
5200 BABCOCK ST NE # 106
PALM BAY FL 32905

MELBOURNE NEUROLOGIC
1945 PALM BAY RED NE
PALM BAY FL 32905

LINDA REMY
MELBOURNE INTERNAL MED A
5270 BABCOCK ST NE # 2
PALM BAY FL 32905

MOHAMMAD IDREES MD
1454 BELLAIRE LN NE
PALM BAY FL 32905

N BAO KOPURI DDS

HOWARD J SMITH MD

REA J STONESIFER DDS

To Bob Snyder

Date 12/23/91 Time 2:10pm

WHILE YOU WERE OUT

Mr. Lee Chotas & Phil Graves
of Environmental Mngmt Systems

Phone 407 841-1200
Area Code Number Extension

<input checked="" type="checkbox"/> TELEPHONED	<input checked="" type="checkbox"/> PLEASE CALL
<input type="checkbox"/> CALLED TO SEE YOU	<input type="checkbox"/> WILL CALL AGAIN
<input type="checkbox"/> WANTS TO SEE YOU	<input type="checkbox"/> URGENT
<input type="checkbox"/> RETURNED YOUR CALL	

Message would like to set up
meeting early January
about R/V gas, refrigeration
etc.

Jennifer
Operator

PHOTOGRAPHIC WASTE DISPOSAL of Florida, Inc.
Protecting you and the Environment.

High Street Trade Center 1943 High Street Longwood, Florida 32750

PILOT PLAN

Prepared by

HAMED RAFIEE - (407) 482-6893
AND
BAHRAM AHMADI

Submitted to

**SEMINOLE COUNTY
FLORIDA**

12/19/91

GENERAL INFORMATION

Photographic Waste Disposal, Inc. will provide services to generators of x-ray and photographic waste solutions to insure proper disposal of their waste according to federal, state and county regulations.

The general scope of operations is presented as follows:

- 1- Facility and storage
- 2- Transportation
- 3- Process the incoming waste solutions.

L- FACILITY AND STORAGE

- 1) All chemicals will be stored and processed inside the warehouse within the concrete containment area approved by the Department of the Environmental Regulation.
- 2) All containers will be labeled properly for identification and will be inspected daily for leaks.
- 3) Spill guns will be mounted on the walls for the use of any container leaks.
- 4) Spill-x agents will be used in case of a spill. If a spill occurs, personnel at the facility will first PH the spill to find if the spill is acidic or alkaline. Upon determination of the PH, agent A (for acid spills) or agent C (for caustic spills) will be applied for neutralizing and solidifying before clean up. After application of the proper agent, the solidified material will be swept up and transferred to the designated containers for proper off-site disposal.

II- TRANSPORTATION

The Photographic Waste Disposal, Inc. will supply the generators with corrosive resistance and D.O.T. approved containers to insure proper storage and transportation.

Before shipment all generators will receive a hazardous waste manifest for their records. The manifest will show the type of solution being transported as a Hazardous Waste Liquid NOS D011 (Silver).

All vehicles will be equipped with emergency spill control kit to be used at times of emergency by properly licensed drivers.

III- PROCESS THE INCOMING WASTE SOLUTIONS

Upon arrival, the waste solutions will be delivered to the unloading area. The solutions are separated in two categories of silver bearing and non-silver bearing.

Silver Bearing Solutions

All silver bearing solutions will be transferred to the silver recovery tanks connected to an automated system. This system will transfer the solutions to the primary silver unit and then to the tailing recovery unit. When the silver recovery operation is completed the solution will be tested for any existing silver content. If the results show presence of any silver The process will continue until the amount of silver in the solution is within the guidelines established by the Environmental Protection Agency. The remaining solution is then considered as non-silver bearing and will be processed as such.

Non-silver bearing solutions

Non-silver bearing solutions contain approximately 85 percent water. These solutions are transferred to holding tanks connected to an evaporator. The evaporator will be used to evaporate the water and convert the solution in to a solid-state (sludge). The remaining sludge will be transferred to 55 gallon lined drums to be shipped for proper off-site disposal.