



# FLORIDA DEPARTMENT OF Environmental Protection

Central District Office  
3319 Maguire Blvd., Suite 232  
Orlando, Florida 32803

**Ron DeSantis**  
Governor

**Jeanette Nuñez**  
Lt. Governor

**Shawn Hamilton**  
Secretary

June 14, 2022

Bahram “Bob” Ahmadi, President  
Photographic Waste Control Inc  
1943 High St  
Longwood, Florida 32750  
[pwcifl@outlook.com](mailto:pwcifl@outlook.com)

Re: Compliance Assistance Offer  
Photographic Waste Control Inc  
HW Facility ID# FLD984229609  
Seminole County

Dear Mr. Ahmadi :

As inspection was conducted at your facility on April 20, 2022. During this inspection, potential non-compliance was noted. The purpose of this letter is to offer compliance assistance as a means of resolving this matter. Specifically, potential non-compliance with the requirements of chapter 403, Florida Statutes, and Chapter 62-730 Florida Administrative Code were observed. Please see the attached inspection report for a full account of Department observations and recommendations.

We request you review the item of concern noted and respond in writing within **15 days** of receipt of this Compliance Assistance Offer. Your written response should include one of the following:

1. Describe what has been done to resolve the non-compliance issue or provide a schedule describing how/when the issue will be addressed
2. Provide the requested information, or information that mitigates the concerns or demonstrates them to be invalid, or
3. Arrange for the case manager to visit your facility to discuss the item of concern.

It is the Department’s desire that you are able to adequately address the aforementioned issues so that this matter can be closed. Your failure to respond promptly may result in the initiation of formal enforcement proceedings.

Please address your response and any questions to Miranda Rothenberger of the Central District Office at 407-897-4301 or via e-mail at [Miranda.Rothenberger@floridadep.gov](mailto:Miranda.Rothenberger@floridadep.gov). We look forward to your cooperation with this matter.

Sincerely,

Photographic Waste Control Inc; Facility ID No.: FLD984229609  
Compliance Assistance Offer  
Page 2 of 2  
June 14, 2022

A handwritten signature in black ink, appearing to read "Daniel Hall".

Daniel Hall, Environmental Manager  
Central District  
Florida Department of Environmental Protection

Enclosures: April 20, 2022 Inspection Report

cc: Miranda Rothenberger, FDEP



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

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**FACILITY INFORMATION:**

**Facility Name:** Photographic Waste Control Inc  
**On-Site Inspection Start Date:** 04/20/2022 **On-Site Inspection End Date:** 04/20/2022  
**ME ID#:** 48416 **EPA ID#:** FLD984229609  
**Facility Street Address:** 1943 High St , Longwood, Florida 32750-3711  
**Contact Mailing Address:** 1943 High St, Longwood, Florida 32750-3711  
**County Name:** Seminole **Contact Phone:** (407) 328-9651

**NOTIFIED AS:**

LQG (>1000 kg/month), Transfer Facility, Transporter, Used Oil

**WASTE ACTIVITIES:**

**Generator:** LQG **Other Status:** Offsite Waste Received **Transporter:** Own Waste, Commercial Waste, Transfer Facility **Used Oil:** Oil Filters **Recycler:** Commercial, Does Not Store Prior to Recycling **Universal Waste:** Indicate types of UW generated and/or accumulated at the facility: **Generate/Accumulate:** Batteries, Mercury Containing Lamps, Mercury Containing Devices **Transport:** Batteries, Pesticides, Mercury Containing Lamps, Mercury Containing Devices **Transfer Facility:** Batteries, Pesticides, Mercury Containing Lamps, Mercury Containing Devices **Maximum quantity of UW handled or transported at any time:** Less than 5,000 kg (11,000 lbs); Small Quantity Handler (SQH)

**INSPECTION TYPE:**

Routine Inspection for Hazardous Waste Transporter Facility

**INSPECTION PARTICIPANTS:**

**Principal Inspector:** Miranda Rothenberger, Inspector  
**Other Participants:** Michael Eckoff, Inspector; Bahram "Bob" Ahmadi, President

**LATITUDE / LONGITUDE:** Lat 28° 43' 35.4002" / Long 81° 18' 26.5244"

**NAIC:** 562112 - Hazardous Waste Collection

**TYPE OF OWNERSHIP:** Private

**Introduction:**

On April 20, 2022, Miranda Rothenberger and Michael Eckoff, Florida Department of Environmental Protection (FDEP or Department) inspected Photographic Waste Control Inc (PWC or Facility) for compliance with state and federal hazardous waste regulations. Bahram (Bob) Ahmadi, owner, represented the facility. The facility is located at 1943 High Street, Longwood, Florida and is currently registered as a hazardous waste transporter and transfer facility; a used oil transporter, transfer facility, filter transporter, filter transfer facility; a registered mercury handler; and notified as a large quantity generator (LQG) of hazardous waste.

The facility originally notified as a hazardous waste transporter on January 8, 1992, and received EPA identification number FLD984229609 on February 10, 1992. The facility most recently provided proof of insurance meeting the hazardous waste transporter and used oil transporter requirements of 62-730.170(2)(a), F.A.C. and 62-710.600(2)(e), F.A.C. on March 7, 2022.

**Inspection History (Past five years)**

PWC was inspected on February 7, 2019, for compliance with state and federal hazardous waste regulations and was in compliance.

**Process Description:**

## Photographic Waste Control Inc Inspection Report

Inspection Date: 04/20/2022

The facility was inspected as a hazardous waste transporter and transfer facility during this inspection.

PWC is a hazardous waste, used oil, and universal waste transporter and transfer facility servicing small businesses generating photographic, printing, and mercury wastes. Waste chemicals are transported from the generator locations to the transfer facility where wastes are stored prior to processing in a silver recovery unit or consolidated for shipment off-site every 10-days for disposal. PWC previously operated from two bays but the operation has consolidated into one bay. The facility consists of offices and a warehouse area containing the silver recovery system and a waste transfer area.

PWC transports small amounts of used oil, oily rags, and oily debris generated by printing presses. Aqua Clean disposes of the waste water. Non-hazardous inks are consolidated and shipped off-site.

Spent photographic fixer containing silver is consolidated directly into an electrolytic treatment unit for recovery of the silver. Treated waste water containing lower levels of silver passes from the electrolytic unit to a 55-gallon drum. The drum is connected to a series of two ion exchange cartridges operated in series for recovery of silver. The first cartridge removes most of the silver and the second cartridge removes the remaining silver. When the first filter is no longer able to effectively remove silver, the cartridge is removed and the second cartridge is moved forward to the first position. This allows PWC to use the cartridges more efficiently and for longer periods of time. Waste passing through the cartridges is stored in a 55-gallon drum. The combined waste stream from the drums is transferred to a tote and shipped for off-site disposal. The silver recovery unit only operates every couple of months due to the reduction in the number of companies using photographic fixer. Most x-ray equipment is now digital.

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

Inside the main bay is an area of the floor outlined in yellow. This "yellow" area is used for storage of flammable wastes as this is the only area of the facility that meets the 50-foot setback requirement of 40 CFR 265.176. This area was not inspected.

### Records

10-day transfer logs were reviewed and found to be out of compliance. Waste received from LQGs and very small quantity generators (VSQGs) were kept on separate logs and the VSQG logs were found to be exceeding the 10-day storage limit on multiple occasions [62-730.171(1), F.A.C.]. Noted was waste received on 03/02/22 and stored until 03/22/22; 04/06/22 and stored until the time of the inspection; and 04/07/22 and stored until the time of the inspection. The LQG logs were in compliance. On May 16, 2022, Mr. Ahmadi submitted a copy of current logs that show compliance with the 10-day storage limit.

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

### New Potential Violations and Areas of Concern:

#### Violations

Type:	Violation
Rule:	<b>62-730.171(1)</b>
Explanation:	40 C.F.R. 263.12 [as adopted by reference in subsection 62-730.170(1), F.A.C.] provides that transporters who store manifested hazardous waste in proper containers at a transfer facility for 10 days or less are exempt from regulation as a hazardous waste facility. If the waste is stored for more than 10 days, the facility is subject to the permitting requirements for a hazardous waste storage facility.
Corrective Action:	The facility failed to comply with the 10-day storage limit or apply for a hazardous waste storage facility permit. The facility is required to comply with the 10-day storage limit for hazardous waste or apply for a hazardous waste storage facility permit.

Inspection Date: 04/20/2022

On May 16, 2022, Mr. Ahmadi submitted a copy of current logs that show compliance with the 10-day storage limit.

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**Conclusion:**

Photographic Waste Control Inc was inspected on April 20, 2022 for compliance with state and federal hazardous waste transporter and transfer facility requirements and was out of compliance.

Inspection Date: 04/20/2022

**1.0: Pre-Inspection Checklist**

## Requirements:

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

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

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

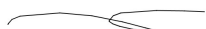
## Photographic Waste Control Inc Inspection Report

Inspection Date: 04/20/2022

**Signed:**

A hazardous waste compliance inspection was conducted on this date, to determine your facility's compliance with applicable portions of Chapters 403 & 376, F.S., and Chapters 62-710, 62-730, 62-737 & 62 -740 Florida Administrative Code (F.A.C.). Portions of the United States Environmental Protection Agency's Title 40 Code of Federal Regulations (C.F.R.) 260 - 279 have been adopted by reference in the state rules under Chapters 62-730 and 62-710, F.A.C

Miranda Rothenberger

**Principal Investigator Name**

**Principal Investigator Signature**

Inspector

**Principal Investigator Title**

DEP

**Organization**

06/03/2022

**Date**

Michael Eckoff

**Inspector Name**

Inspector

**Inspector Title**

DEP

**Organization**

Bahram "Bob" Ahmadi

**Representative Name**

President

**Representative Title**Photographic Waste Control  
Inc**Organization**

NOTE: By signing this document, the Site Representative only acknowledges receipt of this Inspection Report and is not admitting to the accuracy of any of the items identified by the Department as "Potential Violations" or areas of concern.

**Report Approvers:****Approver:** Daniel K. Hall**Inspection Approval Date:**

06/06/2022