

May 2007

Does Your Business Process Photos or Film?

Know Your Ohio EPA Regulations

Introduction

If you have a business that processes photos or film, it's important to be aware of the environmental regulations that may apply to you. Under Ohio EPA's regulations, you may need wastewater permits. You may also be required to notify Ohio EPA of your hazardous waste generator activities. Complying with some regulations, such as getting a wastewater permit, may take some time. So, the earlier you look into your compliance responsibilities, the better.

It's important you know the regulations and comply with them because your company can face violations or penalties if you are found out of compliance. This fact sheet summarizes some of the major Ohio EPA requirements that could apply to photo/film processing. It will provide you with a starting point in identifying areas where your business might be subject to regulation. It may not cover every environmental requirement, though, and should not be used as your only source of information on the regulations.

Managing Hazardous Wastes

Under Ohio's regulations, any business generating waste must evaluate it to determine if it is hazardous waste. Ohio EPA's regulations contain specific lists of hazardous wastes. In addition,

wastes that have certain characteristics such as ignitability, corrosivity or reactivity are considered hazardous. Wastes that contain toxic contaminants at certain levels (including heavy metals like silver) can also be regulated as hazardous.

If your business generates hazardous waste, you are required to follow Ohio's hazardous waste regulations. These regulations include properly managing your hazardous waste on-site and keeping certain records. Hazardous waste must be sent to a permitted hazardous waste facility for disposal and CANNOT be disposed of in your trash dumpster. In addition, if your company generates more than 100 kilograms (or 220 pounds) of hazardous waste in a month, you must get a generator identification number from Ohio EPA.

Under the regulations, there are reduced requirements for wastes sent off-site for precious metals recovery. These regulations encourage recycling. If you are sending silver contaminated wastes (such as fixers or film) off-site for silver reclamation, the hazardous waste requirements would be reduced for these wastes. You would be required to provide a hazardous waste shipping manifest for this waste stream, however, few additional hazardous waste requirements apply.



If you have an on-site silver recovery unit, Ohio EPA does not require a hazardous waste permit to operate this unit. If recovered silver is then sent to a silver refiner, the silver is exempt from the hazardous waste regulations. You can call your local Ohio EPA district office, Division of Hazardous Waste Management for more information on the hazardous waste regulations.

Photo and film processors can generate hazardous wastes. Some of the common hazardous wastes generated include:

- spent fixers;
- spent cleaners;
- films and negatives.

Water Pollution Control

Sanitary Wastewater

Sanitary waste includes waste and wastewater from bathrooms, sinks, etc. Options for managing sanitary waste include discharging it to a public wastewater treatment plant

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(also called a POTW) or discharging it to an on-site sanitary waste treatment system.

If you need to construct a sanitary waste treatment system for your business (e.g., septic tank and leach field, aeration system, mound or filtration system), this activity requires a permit-to-install (PTI) from Ohio EPA. In addition, if there is a discharge from the treatment system to surface water (such as a stream, river or lake) you also need a discharge permit (called an NPDES permit) from Ohio EPA.

Process Wastewater

Photo/film processors usually generate process-related wastewater from film developing, equipment cleaning and other sources. Different requirements apply to process wastewater discharges depending on whether your business has a direct discharge or an indirect discharge.

Direct Discharges

Any discharge of process wastewater to “waters of the state” requires a discharge permit (called an NPDES permit) from Ohio EPA. Examples of waters of the state include streams, rivers, lakes, ponds, marshes, watercourses, waterways and springs. Wastewater discharges entering a conveyance system (like a ditch or storm sewer) that leads to a waterway can also require an NPDES permit.

Direct dischargers are usually required to treat wastewater to remove harmful contaminants (e.g., chemicals or metals) before the

**** IMPORTANT ****

Ohio EPA’s regulations DO NOT allow you to discharge process wastewater into an on-site treatment system, like a septic tank/leach field or mound system. Discharging chemicals into an onsite septic system can kill the helpful bacteria that break down sewage wastes. In addition, chemicals can leach from the system into nearby ground water.

Know where your floor drains go. Don’t let process wastewater go to a septic system. You must find another way to manage process-related wastewater, such as installing a separate holding tank that is pumped out and shipped off-site for disposal either at a wastewater disposal facility, or if hazardous waste, to a hazardous waste disposal facility.

If you process photos or film from a home-based business or other location that is not connected to a POTW, it is very important to contact Ohio EPA’s Division of Surface Water to discuss your options for managing wastewater. See resource section at the end of this fact sheet for links to more information on home-based businesses and wastewater management.

wastewater is discharged. If treatment is required, a permit-to-install (PTI) is needed from Ohio EPA to construct any wastewater treatment units.

Indirect Discharges

If your business is connected to a public sewer and wastewater treatment plant (called a POTW), you may be able to discharge your process wastewater to the POTW. However, wastewater treatment plants are not generally designed to handle contaminants like chemicals, metals, oils, etc. They are designed to handle sewage-related wastes and wastewater only.

Before you discharge any process wastewater to your local POTW, you need to contact the POTW directly for permission to discharge wastewater to them. You may be re-

quired to get a permit before you can discharge your wastewater to the POTW. You may also be required to conduct “pretreatment” to remove contaminants (e.g., metals, oil, solids or chemicals) before discharging your wastewater. If you are required to install wastewater treatment or storage units, this activity requires a permit-to-install (PTI) from Ohio EPA.

Many POTWs have requirements (through local sewer ordinances) to control the amount of silver discharged to them. They may require the use of best management practices (BMPs), such as installing a silver recovery device to remove silver from wastewater. Other requirements may include wastewater monitoring and record keeping. It is very important that

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you contact your local POTW before discharging any process related wastewater to discuss local requirements with them.

You can contact your local Ohio EPA district office, Division of Surface Water for more information on the wastewater discharge and permitting requirements. A list of wastewater treatment plants is available at www.epa.state.oh.us/dsw/pretreatment/web2a.html. If your local wastewater plant is not listed, you will need to call your local utilities office for contact information.

Drinking Water

If your business has its own well that supplies water for drinking, cooking, washing hands, washing dishes, etc., it may meet Ohio EPA's definition of a public water system. A public water system is one that has at least 15 service connections or regularly provides water to 25 or more people for 60 or more days a year. Under these regulations, you must submit plans for installing or changing a well. In addition, well systems must be tested periodically and the test results reported to Ohio EPA.

Contact your local Ohio EPA district office, Division of Drinking & Ground Waters for more information on well system requirements.

Pollution Prevention

You can save money and may be able to reduce your regulatory requirements if you find ways of preventing pollution. This can include recycling or reducing waste streams. Pollution prevention options for photographic processing include:

- monitoring your process and optimizing chemical usage;
- using a closed loop silver recovery system;
- using good housekeeping practices to minimize spills; and
- sending silver and other materials off-site for recycling.

Need More Help?

This fact sheet is a starting point to help you identify the regulations that apply to photo and film processing. If you have questions, you can also contact Ohio EPA's Office of Compliance Assistance and Pollution Prevention (OCAPP) for help. OCAPP is a non-regulatory office of Ohio EPA with a goal of helping small businesses comply with environmental regulations and permitting requirements. If you are operating a small business with fewer than 100 employees, we can help you! For more information, contact OCAPP at 800-329-7518, or visit our Web site at www.epa.state.oh.us/ocapp/sb/index.html.

Resource Links

Small Business Environmental Compliance Self-Assessment Guide
www.epa.state.oh.us/ocapp/sb/publications/selfgde.pdf

Pollution Prevention, Getting Started (fact sheet)
www.epa.state.oh.us/opp/planning/factsheet5.pdf

Identifying Your Hazardous Waste (fact sheet)
www.epa.state.oh.us/ocapp/sb/publications/identifyingwaste.pdf

Ohio EPA's Wastewater Regulations and Home-Based Businesses
www.epa.state.oh.us/ocapp/sb/publications/wastewaterhomebased.pdf

Ohio EPA's Office of Compliance Assistance and Pollution Prevention Publication Catalogue
<http://ohioepapubs.custhelp.com>

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Ohio EPA District Offices



Toll-free numbers are for citizens with questions or concerns about environmental issues. The regulated community should use the business line for routine business. Spills and emergencies should be reported to (800) 282-9378.

CDO Central District Office
 50 W. Town St. Suite 700
 Columbus, OH 43215
 (614) 728-3778
 (614) 728-3898 Fax
 (800) 686-2330
www.epa.state.oh.us/cdo

NWDO Northwest District Office
 347 N. Dunbridge Rd.
 Bowling Green, OH 43402
 (419) 352-8461
 (419) 352-8468 Fax
 (800) 686-6930
www.epa.state.oh.us/nwdo

SWDO Southwest District Office
 401 E. Fifth St.
 Dayton, OH 45402-6357
 (937) 285-6357
 (937) 285-6249 Fax
 (800) 686-6357
<http://swdoweb.epa.state.oh.us>

NEDO Northeast District Office
 2110 E. Auroa Rd.
 Twinsburg, OH 44087
 (330) 963-1200
 (330) 487-0769 Fax
 (800) 686-6330
www.epa.state.oh.us/nedo

SEDO Southeast District Office
 2195 Front St.
 Logan, OH 43138
 (740) 385-8501
 (740) 3856490 Fax
 (800) 686-7330
www.epa.state.oh.us/sedo