

CENTRAL MARIN SANITATION AGENCY
DISPOSAL PROCEDURES FOR PHOTOPROCESSING WASTE
Revised August 15, 2003

All persons performing photoprocessing in the CMSA service area shall comply with either Option #1, #2, or #3 below in order to properly dispose of spent solutions. In addition, all such persons shall comply with the "General Requirements" below.

Definition of Terms

CMSA Service Area - Fairfax, Ross, San Anselmo, Greenbrae, Kentfield, Larkspur, Corte Madera, and areas of San Rafael south of the Santa Venetia ridge (Terra Linda and the Civic Center are north of the ridge).

Photoprocessing - Any process where silver-bearing film, paper, or plates are developed. This specifically includes photolabs, darkrooms, phototypesetting, lithography (plate-making "cameras"), and X-rays.

Spent Solutions - Spent fix, spent bleach-fix, spent stabilizer from washless systems, silver bearing cleaning solutions, and functionally similar wastes other than washwater.

Washwater - Water that has been used to rinse fix or bleach fix from silver-bearing film, paper, or plates.

General Requirements

No photoprocessing wastes of any kind shall be disposed of to storm drains, surface waters, the ground, or a septic tank. This prohibition specifically includes washwater and waste developer, as well as "spent solutions" as defined above. All photoprocessing operations and storage of all process chemicals and wastes shall be conducted so that spills to storm drains, surface waters, the ground, septic tanks, or sanitary sewers are prevented.

Information on legal storage, transportation, and recycling of photoprocessing wastes can be obtained from your "Certified Unified Permit Agency" (CUPA). In the City of San Rafael the CUPA is the San Rafael Fire Department, Hazardous Materials Division (485-3308). In all other parts of Marin County the CUPA is the County of Marin Department of Public Works, Office of waste Management (499-6647).

Option #1 - Hauling Spent Solutions Off Site

All "spent solutions", as defined above, shall be collected and shipped off site for silver reclamation and/or disposal. Transportation, reclamation, and disposal shall be in accordance with applicable laws and regulations.

All spent solutions must be captured by a container for off site disposal. No spent solution waste streams shall be plumbed directly to a sewer, sink, or floor drain, or to another waste stream which is plumbed directly to a sewer, sink, or floor drain.

Option #1 may be combined with Option #2 below.

Option #2 - Standard Silver Recovery

All "spent solutions", as defined above, shall be treated by a silver recovery system, as described below, prior to being discharged to the sanitary sewer.

The silver recovery system shall consist, as a minimum, of one the following sets of equipment:

- o An electrolytic silver recovery unit followed by a metallic replacement cartridge. The electrolytic unit may be used either to treat effluent waste solutions or as an "on-line" silver recovery unit.
- o Two metallic replacement cartridges installed in series.

The flow through the cartridges shall be maintained, using a metering pump, at or below the cartridge manufacturer's specifications. Cartridges shall be dated upon installation and replaced when they no longer remove silver efficiently. Replacement of the cartridges shall be in accordance with the manufacturer's recommendations, but in no instance shall a cartridge be in use for more than six months. Cartridge installation and replacement dates, and a record of approximate volumes of waste treated, shall be kept in a log on site for a period of at least three years.

Transportation, reclamation, and disposal of spent cartridges and silver reclaimed from electrolytic units shall be in accordance with applicable laws and regulations.

At the discretion of CMSA, a different silver recovery system may be accepted as equivalent to the systems described above. This will be done where it is evident that silver removal by the system in question will be at least as high as by the systems described above. Where wastewater sampling is required to determine the degree of removal, a Wastewater Discharge Permit (Option #3) will be required.

Option #2 may be combined with Option #1, with a portion of the total spent solutions being treated and the remainder being hauled off site.

Option #3 - Discharge Permit

Rather than complying with Option #1 and/or Option #2, a photoprocessor may request issuance of a CMSA wastewater discharge permit. Under the permit, CMSA will periodically sample spent solutions discharged to the sanitary sewer to verify compliance with CMSA's local discharge limit for silver (1.0 mg/L). Permittees not in consistent compliance will be subject to CMSA enforcement action.

Spent solutions may not be mixed with other waste streams, such as washwater, prior to compliance sampling.

There is a fee of \$100 for a two year permit. In addition, the permittee will be responsible for the cost of inspection and sampling by CMSA personnel, as well as the cost of having wastewater samples analyzed at a commercial analytical laboratory.