

Valencia College

Manual for Handling, Marking and Disposal of Dark Room and Photography Chemical Hazardous Waste

Revised: May 31th, 2011; April 16th, 2012

Purpose of Training and Manual

To provide the college employee that works in the photographic dark room setting with an overview of the federal regulations, state laws and college policies and procedures relating to handling and disposal of chemical hazardous. The training will establish a college wide uniform approach and requirements for hazardous waste management regardless of the employee's campus location.

Regulations, Policies Procedures

The information in this manual is extracted from federal and state regulatory requirements, the College Safety Management Manual and current college policies and procedures.

Who is required to be trained?

Any college employee who handles photographic chemicals and/or photographic chemical waste (fixer and/or developer) that is generated at any of the college campus locations.

What are we required to be trained on?

40CFR 262.34(d)(5)(iii) states: The generator (College) must ensure that all employees are thoroughly familiar with proper waste handling and emergency procedures relevant to their responsibilities during normal facility operations and emergencies.....

Generator Status

A site or campus is considered the geographical location where the hazardous waste is produced.

There are three classifications of Generator Status: Large Quantity, Small Quantity (West Campus and East Campus) and Small Quantity-Conditionally Exempt (Osceola and Lake Nona).

A site's generator status is determined by how many pounds per month you ship from your site.

All waste produced on a site must be shipped off of that site.

How to determine what is a Hazardous Waste

Photography chemicals used to develop medical x-rays and black and white photography film are considered hazardous because they are classified as corrosives.

What is a waste chemical?

A waste chemical is simply a chemical that will no longer be used and serves no more purpose in the business setting.

Labeling and Marking of hazardous waste chemical containers.

All hazardous waste chemical containers will be labeled. Photography waste chemicals will be labeled with the appropriate DOT yellow and red “Hazardous Waste” label provided by the Compliance Office. The label will include the chemical name in language form (example: Photo Fixer) and the container will be marked in permanent marker with the Accumulation Start Date (ASD). The ASD is simply when the container started to hold hazardous waste chemicals.

Hazardous Waste Chemical Inventory and Disposal:

A “running” active inventory of all hazardous waste photography chemicals shall be maintained at all times. This is documented on the colleges “Hazardous Waste Disposal Form” included in this manual. All hazardous waste containers shall be marked and numbered in consecutive order and the required information noted on the Hazardous waste Disposal Form. Photo chemicals from West and East Campuses must be disposed of within 180 days of the ASD. This form is submitted to the Compliance Office to obtain quotations for chemical disposal.

Storage of chemical hazardous waste

Like all other chemicals, hazardous waste chemicals should be stored in proper containers and locations. Please store your waste photo chemicals as directed by the Compliance Office. The DEP Weekly Inspection Logs should be filled out for each location where photographic hazardous waste chemical are stored. Please retain this form for 90 days following the disposal of the chemicals listed on this form.

Contingency Plans:

These are required by federal and state regulations. A sample form is contained in this manual. They shall be maintained by each department or area that handles and produces photographic chemical hazardous waste. Contingency Plans will be reviewed annually by the Departmental Dean and Program Director to ensure all information is current and accurate.

Follow up internal audits and inspections

At least once every four months, the college will conduct a formal regulatory audit and inspection of areas that contain photographic chemical hazardous waste and. This regulatory audit will check for compliance with required federal and state regulations and college policies and procedures as they relate to the handling and disposal of chemical hazardous waste. The regulatory audit will be documented and forwarded to the Departmental Dean or Program Director. If required, corrective action will be taken. After review, the Departmental Dean or Program Director will forward a copy of the corrective action taken on the regulatory audit to the Compliance Office. If necessary, a follow up inspection may be conducted to verify correction and compliance. Additionally, informal (non-documented) audits and inspections may be conducted by the college’s Compliance Office.