



MASSACHUSETTS WATER RESOURCES AUTHORITY

2 Griffin Way
Chelsea, MA 02150

Telephone: (617) 242-6000
Facsimile: (617) 371-1604

TO: Holders of Group Permit for Photo Processing and Printing Operations
FROM: Toxic Reduction and Control (TRAC)
DATE: February 4, 2011
SUBJECT: Annual Compliance Report for Photo Processing and Printing Operations

Enclosed is your Annual Compliance Report for calendar year 2010. Please complete the report based upon your operations during calendar year 2010. **It must be received in MWRA's Toxic Reduction and Control by March 31, 2011. The mailing address is MWRA, TRAC, 2 Griffin Way, Chelsea, MA 02150.**

Important Reminders:

- **Your lab must submit your silver sample result(s) electronically at <http://websmr.mwra.com>. This is a new website. MWRA will only accept sample results that are submitted electronically.**
- Submit a paper copy of your silver sample result including the chain of custody form (attached to your G1 or C1 Permit) for samples taken in 2010.
- Your report must be signed by a responsible individual capable of certifying that the information submitted is true, accurate, and complete.
- Please review and update the information on Page 1.
- Completion and submittal of the report constitutes only partial compliance with your Group Permit for Photo Processing and Printing Operations (for instance, you must notify the MWRA in writing at least thirty days before you close or move your facility or substantially change your operations).
- Failure to submit a completed report may result in financial penalties and other enforcement. Last year, TRAC issued 3 Penalty Assessment Notices, totaling \$2,000.00, to companies that failed to submit the annual G1 Compliance Report or annual silver sample result (or both) as required by the Group Permit for Photo Processing and Printing Operations. The penalty amounts ranged from \$500.00 to \$1,000.00.

If you have any questions about completing the form, please contact your Industrial Coordinator. An electronic version of this form can be found on MWRA's website @ www.mwra.com.

MASSACHUSETTS WATER RESOURCES AUTHORITY/TRAC

	MUNICIPALITY	INDUSTRIAL COORDINATOR	PHONE
44	Allston	John Norton	617-305-5656
01	Arlington	Steve Buczko	617-305-5619
02	Ashland	Lisa Chapman	617-305-5622
03	Bedford	Lisa Chapman	617-305-5622
04	Belmont	Dennis Capraro	617-305-5620
45	Boston (downtown)	Steve Buczko	617-305-5619
06	Braintree	Eric Renda	617-305-5662
46	Brighton	Erika Samuels	617-305-5666
07	Brookline	Mike Walsh	617-305-5670
08	Burlington	Lisa Chapman	617-305-5622
09	Cambridge	Walter Schultz	617-305-5665
10	Canton	Eric Renda	617-305-5662
47	Charlestown	Erika Samuels	617-305-5666
11	Chelsea	Lori LaPointe	617-305-5645
57	Clinton	Lori Paradice	617-305-5658
12	Dedham	Lisa Chapman	617-305-5622
48	Dorchester	Erika Samuels	617-305-5666
49	East Boston	John Norton	617-305-5656
13	Everett	Mike Walsh	617-305-5670
14	Framingham	Lisa Chapman	617-305-5622
15	Hingham	Steve Buczko	617-305-5619
16	Holbrook	George Riley	617-305-5664
50	Hyde Park	Erika Samuels	617-305-5666
51	Jamaica Plain	Erika Samuels	617-305-5666
58	Lancaster	Lori Paradice	617-305-5658
17	Lexington	Lori LaPointe	617-305-5645
18	Malden	Dennis Capraro	617-305-5620
52	Mattapan	John Norton	617-305-5656
19	Medford	Erika Samuels	617-305-5666
20	Melrose	Dennis Capraro	617-305-5620
21	Milton	Steve Buczko	617-305-5619
22	Natick	Lori Paradice	617-305-5658
23	Needham	Eric Renda	617-305-5662
24	Newton	Mike Walsh	617-305-5670
25	Norwood	George Riley	617-305-5664
26	Quincy	George Riley	617-305-5664
27	Randolph	George Riley	617-305-5664
28	Reading	Steve Buczko	617-305-5619
29	Revere	Mike Walsh	617-305-5670
53	Roslindale	John Norton	617-305-5656
54	Roxbury	John Norton	617-305-5656
30	Somerville	Mike Walsh	617-305-5670
55	South Boston	John Norton	617-305-5656
31	Stoneham	Steve Buczko	617-305-5619
32	Stoughton	Eric Renda	617-305-5662
33	Wakefield	Mike Walsh	617-305-5670
34	Walpole	Eric Renda	617-305-5662
35	Waltham	Lori Paradice	617-305-5658
36	Watertown	Lori LaPointe	617-305-5645
37	Wellesley	Lisa Chapman	617-305-5622
56	West Roxbury	Erika Samuels	617-305-5666
38	Westwood	George Riley	617-305-5664
39	Weymouth	George Riley	617-305-5664
40	Wilmington	Lori LaPointe	617-305-5645
41	Winchester	Steve Buczko	617-305-5619
42	Winthrop	Steve Buczko	617-305-5619
43	Woburn	Dennis Capraro	617-305-5620



MASSACHUSETTS WATER RESOURCES AUTHORITY
GROUP PERMIT ANNUAL COMPLIANCE REPORT - (for calendar year 2010)
Photo Processing and/or Printing Operations
Due Date: March 31, 2011

Return Completed Form To: Massachusetts Water Resources Authority
2 Griffin Way
Chelsea, MA 02150
ATTN: TRAC - G1 Permit

Please complete this form to update information you reported in your last Group Permit Compliance Report. Answer all the questions. If a question does not apply, please indicate N/A. The signed report and supporting documentation must be received by the MWRA by **March 31, 2011**. **If MWRA does not receive your completed report by March 31, 2011, you may be subject to financial penalties and other enforcement action.**

If you have any questions about completing this form, please contact your Industrial Coordinator. (A list of Industrial Coordinator telephone numbers is enclosed)

1. General Information (please **correct** and complete this information directly on this form)

MWRA Permit Number:

Company Name:

Facility Address:

Facility Contact:

Title:

Telephone:

Fax number:

E-mail Address:

Permit/Mailing Address:

Permit Contact:

Title:

Telephone:

Fax number:

E-mail Address:

Billing Address:

Billing Contact:

Title:

Telephone:

Fax number:

E-mail Address:

Nature of Operations at Your Facility

The following questions are designed to determine if your facility has the appropriate MWRA permit. Please answer all of the questions below.

2. What does your facility do?

- Printer:** including lithography using presensitized plates, specifically from: 1) the offset lithographic plate making process, including direct to plate (DTP) and/or computer to plate (CTP) processes; 2) fountain solution mixture; 3) photo processing (as part of printer's operations); 4) cleaning operations; and 5) prepress operations, including proofing systems and image setting equipment. **(Prepress houses and service bureaus are considered printers).**

Does your facility conduct direct to plate (DTP) or computer to plate (CTP) processes? Yes No

- Photo Processor:** processing from color and black and white film, prints and slides, x-rays, and negative microfilm.

3. Is your facility located in a residence? Yes No

4. Do you perform only hand tray processing? Yes No

5. On average, does your facility discharge 25,000 gallons or more per day of wastewater from photoprocessing or printing operations? Yes No

6. Please indicate how your facility disposes of its fixer solution:

- Fixer solution is hauled from the facility.
 Fixer solution is treated and discharged to the sewer.
 Other (please describe) _____

7. For printing facilities that generate wastes from lithography using presensitized plates:
(check the one, which applies)

- Fountain solution mixture is not used at the facility.
 Spent fountain solution mixture is hauled from the facility or evaporated and is not discharged to the sewer system.
 Spent fountain solution mixture is discharged from the facility to the sewer system at the following volume and frequency. (average gallons per month): _____

NOTE:

- If you generate up to 55 gallons per month of spent fountain solution mixture, you may discharge that spent fountain solution to the sewer if you have an MWRA permit.
- If you generate more than 55 gallons per month of spent fountain solution mixture, you must request and receive advance written authorization from the MWRA to discharge any amount of spent fountain solution to the sewer. Make your request below by checking the "yes" box and completing the remainder of the requirement.

Yes. My facility generates more than 55 gallons per month of spent fountain solution mixture and I request permission to discharge up to _____ gallons of spent fountain solution to the sewer system per month. (You must submit with your Compliance Report, monitoring results from an analytical laboratory showing the characteristics of your spent fountain solution).

If you have received written authorization from the MWRA to discharge greater than 55 gallons per month of spent fountain solution, provide the date of the authorization here:_____. You are not required to request authorization again unless the volume or characteristics of your discharge changes.

Operations and Discharge Information

The purpose of this section is to describe all discharges to the MWRA sewer system from your facility. (Check Yes or No for each discharge or activity listed below).

8. What does your facility discharge to MWRA Sewer?

Types of Solutions	Ye s	No
<i>Fixer</i>		
Rinsewater		
Developer		
Activator		
Water from cleaning equipment		
Solvents		
Laboratory Waste		
Fountain Solution		

8a. Does your facility discharge wastewater to the MWRA sewer from any of the following activities? (Please check Yes or No)

Types of Activities	Yes	No
<i>Processing Color film, prints or slides</i>		
<i>Processing negative microfilm</i>		
<i>Processing black and white film, prints or slides</i>		
<i>Processing x-rays</i>		
<i>Processing Motion Picture film</i>		
Processing black and white slides or transparencies or positive microfilm using a reversal dichromate bleach processing solution		
Screen printing		
Flexographic or gravure/rotogravure printing process		
Plate developing using a petroleum-based additive process		
Engraving plate manufacturing		
The manufacture or distribution of photographic or printing chemicals.		
The recovery of materials from, of from the reprocessing or recycling of, photo processing or printing wastes (except as part of your silver treatment of wastes generated from your own photo processing and printing operations.		

9. How many film, paper, or slide processors are used at your facility? _____

10. On average, how many days per week does your facility discharge photo or printing wastewater? _____ days/week

11. On average, how many hours per day do you discharge photo or printing wastewater? _____ hours/day

12. What was the average volume discharged from your photo processing and printing processes, including rinsewater, in gallons per day? _____gpd

12a. How did you determine this flow?

- Water supply meter readings
- Manufacturers' processing specifications
- Wastewater flow meter readings
- Estimated (describe method)_____

13. Estimate the percentage of daily flow from your silver recovery unit(s): _____%

14. Where is the wastewater from your photo processing and printing processes, including rinsewater, discharged? (check all that apply)

- Floor drain
- Sink
- Standpipe
- Other_____

15. For Calendar Year 2010, provide in the following table the average monthly volume of photo or printing chemicals and rinsewater used in processing per month:

Chemistry (Solutions)	Average Monthly Volumes (In Gallons)	Check Here If Annual Sample Included This Solution
Fixer		
Bleach-Fix		
Stabilizer (washless systems)		
Bleach		
Developer (photo and/or plate)		
Equipment Washdown		
Rinsewater (photo and/or plate)		
Conditioner		
Other (e.g., reversal, fountain solution, cleaner, etc.)		
TOTAL		

Hauled Wastes

16. If wastes were hauled from your facility during Calendar Year 2010, please provide the following information:

Waste Type	Estimated Quantity (include units)	Name/Address of Waste Hauler
Fixer		
Developer		
Ink		
Silver Harvested from Silver		
Other (describe)		
Hazardous Waste (describe)		

Provide your facility's Hazardous Waste Generator I.D. Number (if applicable): _____

Pretreatment Information

17. For Calendar Year 2010, indicate the silver recovery (pretreatment) used at your facility and the total treatment capacity of each unit (in volume, supplied from your manufacturer). (If None are used, indicate N/A in the "Number of Units" column)

Type of Unit	Number of Units	Treatment Capacity (gallons per day)
<i>Electrolytic</i>		
Metallic Replacement (Steel Wool Canisters)		
Ion Exchange		
Evaporation/Distillation		
Self-contained automated chemical precipitation system (e.g., Kodak SR 2000)		
Other Chemical Precipitation		
EPAN		
Other:		

18. If you use chemical precipitation silver recovery, list the manufacturer, brand name, and model of your system:

If you use chemical precipitation silver recovery, is it in series with an electrolytic unit?

yes No. If yes, describe the arrangement of your pretreatment equipment:

If you use metallic replacement silver recovery, is it in series with an electrolytic unit?

yes No

19. Did you install a new silver recovery system in 2010? yes No

If yes, date new system installed: _____

20. Other Wastewater Pretreatment Systems used at your facility (other than silver recovery): (check all that apply)

pH Neutralization by chemical addition (describe) _____

limestone chip tank

Other (describe) _____

Wastewater Sampling and Analysis Information

Please enter the results of silver sample(s) taken during Calendar Year 2010.

Sample Date	Sample Location Number	Silver Analysis Result
/ /		
/ /		
/ /		

Was the sample collected immediately after the silver recovery system?

Yes No *If yes, please read below carefully*

If:

- You took a sample only of the discharge from your silver recovery unit, AND
- The analytical result was > 2 mg/l

Then:

You must do a mathematical calculation to determine if your equipment is effectively removing silver to

The mathematical calculation is done in two steps:

Step1: Determine the percentage that the silver recovery system is to the total discharge of fixer, rinsewater, developer, etc.

Step 2: Multiply the result from Step 1 by the silver sample analytical result you received.

Example:

- You took a sample only of your silver recovery system without rinsewater
- You discharge 4 gallons of rinsewater and developer for each 1 gallon you discharge from silver recovery.
- Silver sample analytical result received = 5.0 mg/l

Step 1: 1 (silver recovery discharge in gallons per day \div 5 (total of rinsewater + developer + silver recovery discharge in gallons per day) = **.20**

Step 2: $.20$ (result from Step 1) \times 5.0 mg/l (silver sample analytical result received) = **1.00 mg/l**. Result is in compliance with the silver discharge limit of 2.0 mg/l.

Please complete the following for your facility:

Step (silver recovery discharge in gallons per da) (total of rinsewater + developer + silver recovery discharge in gallons per da)

Step 2: (result from Step 1) \times (silver sample analytical result received) = mg/l.

The following questions have been added from the Massachusetts Department of Environmental Protection's (DEP's) Compliance Certification for Photo Processors.

Is your photo processing operation directly piped to the silver recovery system?

yes no

If no, please answer the following:

Are you in compliance with the basic requirements for storing untreated wastewater in appropriate tanks and containers as defined in DEP's Workbook: yes no

Please refer to DEP's Photo Processor Environmental Certification Workbook.

How many gallons of silver bearing wastewater did you treat through your silver recovery system? _____gallons/year (2010)

What Should You Submit With Your Compliance Report?

1) Silver Sample Result

Please attach a paper copy of your silver sample result(s) to your completed Compliance Report.

Your result(s) must include a completed sample chain of custody form (a copy of the chain of custody form is attached to your G1 or C1 Permit).

Important Reminder: Your lab must submit your silver sample result(s) electronically over the Internet at <http://websmr.mwra.com>. If your result(s) are not submitted electronically, MWRA will consider the report as not submitted. Missing reports are subject to enforcement action.

2) Copy of the Maintenance and Sample Log

For your log to be considered complete it should include the following information:

- Sampling dates and results of the annual silver sample
- If your silver sample result was greater than 2 mg/l, the log must include a description of the steps you took to return to compliance. For example, the log should indicate when you changed your equipment or took other steps to return the equipment to its effectiveness. The log should also contain analytical results of a silver sample taken to demonstrate that the steps you took to return to compliance were successful.
- Dates of installation and replacement of metallic replacement cartridges, silver harvesting dates, and cleaning and servicing dates.
- The amount of spent fountain solution mixture discharged each month. (This requirement applies to printing facilities)

3) Sample Analyses and Reporting Certification Form (Attached to Compliance Report)

All G1 or C1 permit holders complete the attached form and return it to MWRA along with your Compliance Report.

- 4) A list of catalog numbers, brand names, and product descriptions of all photo chemicals used in your facility for the first time.**
- 5) Copies of water bills. (Only if you discharge an average of at least 10,000 gallons per day)**
- 6) Copy of pH Logs. (Only if you discharge from a DTP or CTP process). A copy of the pH Log Form is attached to your G1 Permit.**

Who May Sign This Compliance Report?

Certification Form/Authorized Representative

The permittee shall submit the Sample Analyses and Reporting Certification Form required by this permit. Each certification form shall be signed and dated by an Authorized Representative of the permittee. An Authorized Representative is a:

- (a) Responsible corporate officer, if the permittee is a corporation. For the purpose of this requirement, a responsible corporate officer means a president, secretary, treasurer, or vice president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or the manager of one or more manufacturing, production, or operating facilities, provided, the manager is authorized to make management decisions which govern the operation of the regulated facility including having the explicit or implicit duty of making major capital investment recommendations, and initiate and direct other comprehensive measures to assure long-term environmental compliance with environmental laws and regulations; can ensure that the necessary systems are established or actions taken to gather complete and accurate information for the permit requirements; and where authority to sign documents has been assigned or delegated to the manager in accordance with corporate procedures.
- (b) General partner or proprietor if the permittee is a partnership or sole proprietorship respectively.
- (c) Duly authorized representative of the individual designated in (a) or (b) of this section if:
 - i) the authorization is made in writing by the individual described in (a) or (b);
 - ii) the authorization specifies either an individual or a position having responsibility for the overall operation of the facility from which the industrial discharge originates, such as the position of plant manager, operator of a well, or well field superintendent, or a position of equivalent responsibility, or having overall responsibility for environmental matters for the company;
 - iii) the written authorization is submitted to the MWRA

If an authorization is no longer accurate because a different individual or position has responsibility for the overall operation of the facility, or overall responsibility for environmental matters for the permittee, a new authorization satisfying the requirements of this section must be submitted to the MWRA prior to or together with the next report required of the permittee.

Certification

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature:

Print the name of the person whose signature is above:

Title:

Date:

SAMPLE ANALYSES AND REPORTING CERTIFICATION FORM
FOR SUBMISSION DIRECTLY FROM THE LABORATORY

The permittee must have a current signed and dated copy of this form on file with the MWRA.

Permittee Name:

MWRA Permit Number:

I hereby certify that I have engaged an independent laboratory (which is certified by the Massachusetts Department of Environmental Protection to perform wastewater analyses) to submit to the MWRA, via its electronic Self Monitoring Analytical Report Tracking (e-SMART), the reports of the analyses of sampling required by the MWRA. I certify under penalty of law that the information submitted through the MWRA's web-based program, and accompanying chain of custody forms, provided to the MWRA by the laboratory, were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information to be submitted by the laboratory will be, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

I certify that I have instructed the laboratory to provide me with a copy of each report it submits to the MWRA on my behalf, no later than the day it submits the report to the MWRA, I understand that I am responsible to assure that such reports are timely submitted to me and to the MWRA.

I understand that this certification applies to the laboratory I now use and to any laboratory, I may use in the future.

Signature of Authorized Representative

Date

(Print name and title of Authorized Representative)