MASSACHUSETTS WATER RESOURCES AUTHORITY



Chelsea Facility 2 Griffin Way Chelsea, Massachusetts 02150

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

SENT ELECTRONICALLY

TO: Holders of MWRA Group Permit for Photo Processing and Printing Operations

FROM: MWRA, Toxic Reduction and Control (TRAC)

DATE: February 14, 2022

SUBJECT: MWRA Annual Compliance Report for Photo Processing and Printing Operations

Due March 31, 2022

Attached, is your MWRA Annual Compliance Report for calendar year 2021. **Complete the report based upon your operations during calendar year 2021**. The MWRA requires the submittal of the Annual Compliance Report for Photo Processing and Printing Operations both by standard mail and electronically by **March 31**, **2022**.

- 1) The completed **original "WET" signed Annual Compliance Report**, hardcopy, <u>must</u> be received by MWRA's Toxic Reduction and Control (TRAC) by March 31, 2022, and the mailing address is: MWRA, TRAC, 2 Griffin Way, Chelsea, MA 02150; and,
- 2) The completed signed (PDF) Annual Compliance Report <u>must</u> be received electronically via email by March 31, 2022, and the MWRA email address is: <u>TRACPermits@mwra.com</u>.

Important Reminders:

- Your lab <u>must</u> submit your silver sample result(s) electronically at this website http://websmr.mwra.com.
 MWRA will only accept sample results that are submitted electronically.
- Also, you must submit a paper copy of your silver sample result including the chain of custody form (attached to your MWRA G1 or C1 Permit) for samples taken in 2021, and submit them with the Annual Compliance Report.
- Your report must be signed by a responsible individual capable of certifying that the information submitted is true, accurate, and complete.
- You must submit contact information for the Facility, Permit, and Billing questions 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 (30) days before you close or move your facility or substantially change your operations).
- To maintain MWRA authorization to discharge more than 55 gallons per month of spent fountain solution mixture to the sewer, you must have this discharge analyze each calendar year as required by the Group Permit for Photo Processing and Printing Operations. The analytical results must be submitted electronically and as hardcopy annually with your Annual Compliance Report.

• Failure to submit a completed Compliance Report by March 31, 2022, may result in financial penalties and other enforcement. TRAC may issue Penalty Assessment Notices, 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.

If you have any questions about completing the form, please contact Keary Simmerman, MWRA Industrial Coordinator, Toxic Reduction and Control, at (617) 305-5638, or keary.simmerman@mwra.com. An electronic version of this form can be found on MWRA's website https://www.mwra.com/03sewer/html/trac.htm

MASSACHUSETTS WATER RESOURCES AUTHORITY

GROUP PERMIT ANNUAL COMPLIANCE REPORT

For Photo Processing and/or Printing Operations

(for calendar year 2021)

Due Date: March 31, 2022

You must submit the signed original "wet" report form to: Massachusetts Water Resources Authority

2 Griffin Way Chelsea, MA 02150

ATTN: TRAC - G1/C1 Permit

And you must submit the signed report form electronically via Email to: TRACPermits@mwra.com

Complete this form to update information you reported in your last Group Permit Compliance Report. Complete the report based upon your operations during calendar year 2021. Answer all the questions. If a question does not apply, please indicate N/A. The signed report (hardcopy) and supporting documentation must be received by the MWRA by March 31, 2022, by standard mail and electronically. If MWRA does not receive your completed report by March 31, 2022, you may be subject to financial penalties and other enforcement action.

If you have any questions about completing this form, please contact Keary Simmerman, MWRA Industrial Coordinator, Toxic Reduction and Control, at (617) 305-5638, or keary.simmerman@mwra.com

_	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.
2a.	Does your facility conduct only digital photo processing on site? □Yes □No If yes, Did you stop discharging all wastewater from the facility to the sewer? □Yes □No Did you stop discharging all spent fixer solution from the facility to the sewer? □Yes □No.
	Indicate the date you stopped discharging all wastewater and spent fixer solution to
	the sewer from the photo processing operation. Date:
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.	 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)

Nature of Operations at Your Facility

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.
reques system	My facility generates more than 55 gallons per month of spent fountain solution mixture and I t permission to discharge up to gallons of spent fountain solution to the sewer per month. (You must submit with your Compliance Report, monitoring results from an analytical ory showing the characteristics of your spent fountain solution).
	have received written authorization from the MWRA to discharge greater than 55 gallons per month nt fountain solution, provide the date of the authorization here:
You are	e not required to request authorization again unless the volume or characteristics of your discharge es.
mixture	ntain MWRA authorization to discharge more than 55 gallons per month of spent fountain solution to the sewer, you must have this discharge analyzed each calendar year. The analytical results e submitted annually with your Annual Compliance Report.
DEP ce chain c	e Spent Fountain Solution Mixture Sampling. The sampling and analysis shall be performed by a ertified independent laboratory that is fully certified for the pollutants being analyzed. Use the of custody form and sample location number provided with permit. The samples shall be analyzed cribed in the permit. A copy of this form is attached to this Compliance Report for your use.

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	Yes	No
Fixer	□Yes	□No
Rinsewater	□Yes	□No
Developer	□Yes	□No
Activator	□Yes	□No
Water from cleaning equipment	□Yes	□No
Solvents	□Yes	□No
Laboratory Waste	□Yes	□No
Fountain Solution	□Yes	□No

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
Processing Color film, prints or slides	□Yes	□No
Processing negative microfilm	□Yes	□No
Processing black and white film, prints or slides	□Yes	□No
Processing x-rays	□Yes	□No
Processing Motion Picture film	□Yes	□No
Processing black and white slides or transparencies or positive microfilm using a reversal dichromate bleach processing solution	□Yes	□No
Screen printing	□Yes	□No
Flexographic or gravure/rotogravure printing process	□Yes	□No
Plate developing using a petroleum-based additive process	□Yes	□No
Engraving plate manufacturing	□Yes	□No
The manufacture or distribution of photographic or printing chemicals.	□Yes	□No
The recovery of materials from the reprocessessing 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	□Yes	□No

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

How did you determine this flow? ☐ Water supply meter readings ☐ Manufacturers' processing specificati ☐ Wastewater flow meter readings ☐ Estimated (describe method):							
Estimate the percentage of daily flow	Estimate the percentage of daily flow from your silver recovery unit(s): %						
Where is the wastewater from your phrinsewater, discharged? (check all that ☐ Floor drain ☐ Standpipe ☐ Sink ☐ Other							
For Calendar Year 2021, provide in the photo or printing chemicals and rinse							
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							
ed Wastes If wastes were hauled from your faciliful following information: Waste Type	ity during Calendar Yea	r 2021, please provide the Name/Address Of Wast					
	(include units)	Hauler					
Fixer Developer							
Ink							
Silver Harvested from Silver Recovery							
Other (describe)							
Hazardous Waste (describe)							

Pretreatment Information

☐ limestone chip tank

ery, list the	manufacturer, brand name, a		
ery, list the	manufacturer, brand name, a		
ery, list the	manufacturer, brand name, a		
ery, list the	manufacturer, brand name, a		
ery, list the	manufacturer, brand name, a		
ery, list the	manufacturer, brand name, a		
ery, list the	manufacturer, brand name, a		
ery, list the	manufacturer, brand name, a		
ery, list the	manufacturer, brand name, a		
-	series with an electrolytic uni		
y, is it in se	eries with an electrolytic unit?		
Did you install a new silver recovery system in 2021? ☐Yes ☐No If yes, date new system installed:			
d at your fa	cility (other than silver recov		

Other (describe)

Wastewater Sampling and Analysis Information

	Sample Date	er sample(s) taken during Caler Sample Location Number	Silver Analysis Result
	Was the sample	e collected immediately after th	e silver recovery system?
		sample only of the discharge from your al result was > 2 mg/l	silver recovery unit, AND
		mathematical calculation to deter oving silver to achieve compliance	
The mathem	natical calculation is	done in two steps:	
Step1:	Determine the p rinsewater, deve		system is to the total discharge of fixer,
Step 2:	Multiply the resu	lt from Step 1 by the silver sample	e analytical result you received.
Example:			
You took a	sample only of your	silver recovery system without ring	sewater
reco	very.	of rinsewater and developer for e result received = 5.0 mg/l	each 1 gallon you discharge from silver
Step 1:	,	ry discharge in gallons per day ÷ ge in gallons per day) = .20	5 (total of rinsewater + developer + silve
Step 2:	•	Step 1) x 5.0 mg/l (silver sample a pliance with the silver discharge li	analytical result received) = 1.00 mg/l. mit of 2.0 mg/l.
Please comp	plete the following fo	r your facility:	
Step 1:	_ ` ,	scharge in gallons per day) ÷	(total of rinsewater + developer
		ischarge in gallons per	day)=
Step 2:	(result from	n Step 1) X silver sample ar	nalytical 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 (2021)

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 G1or C1 Permit).

Important Reminder: Your lab <u>must</u> 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	Date	
Print the name of the person whose signature is above	Title	

SAMPLE ANALYSES AND REPORTING CERTIFICATION FORM

FOR SUBMISSION DIRECTLY FROM THE LABORATORY

The permittee must have a current signed and dated c	copy of this form on file with the MWRA.
Industry Name:	
Permit #:	
Department of Environmental Protection to perform Information Management System Web Self-Monitor reports of the analyses of sampling required by the M through the MWRA's web-based program, and accolaboratory, were prepared under my direction or squalified personnel gather and evaluate the information manage the system, or those persons directly responsibly the laboratory will be, to the best of my knowledge	independent laboratory (which is certified by the Massachusett wastewater analyses) to submit to the MWRA, via its Pretreatmenting Report (Web SMR) available at http://websmr.mwra.com/ , the IWRA. I certify under penalty of law that the information submitted ompanying chain of custody forms, provided to the MWRA by the supervision in accordance with a system designed to assure that the cion submitted. Based on my inquiry of the person or persons whe sible for gathering the information, the information to be submitted and belief, true, accurate, and complete. I am aware that there are no, including the possibility of fine and imprisonment for knowing
	to provide me with a copy of each report it submits to the MWRA port to the MWRA. I understand that I am responsible to assure that WRA.
I understand that this certification applie future.	es to the laboratory I now use and to any laboratory, I may use in the
Signature of Authorized Representative	Date

Title of Authorized Representative

Print name of Authorized Representative

GROUP PERMIT FOR PHOTO PROCESSING AND PRINTING OPERATIONS Request to Discharge Spent Fountain Solution Mixture Form

For Offset Lithographic Printers Only

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. To request authorization, you must complete and submit this Form, have your fountain solution mixture analyzed, and submit the analytical results to the MWRA. Also, please use the Chain of Custody/Field Form provided in the back of the permit. A copy of this Form is attached to this Compliance Report for your use.

FAG	CILITY NAME: PERMIT NO:	
FAG	CILITY ADDRESS:	
1	What is the average volume (gallons) of spent fountain solution you discharge to the sewer per month?	
2.	How many days per month do you discharge the spent fountain solution?	
3.	Do you discharge any other industrial wastewater to the sewer? uges ug	
(If y	your answer to question #3 above is no, skip questions #4, #5, and #6.)	
4.	What is the average volume of the other industrial wastewater you discharge to the sewer per month? gallo per month.	ns
5.	How many days per month do you discharge the other industrial wastewater?	
6.	List process(es) resulting in the other industrial wastewater discharge(s):	
7.	How is the spent fountain solution discharged to the sewer? ☐ Hard Pipe ☐ Sink ☐ Floor Drain ☐ Stand Pipe ☐ Other (specify)	
8.	Please have an independent DEP certified laboratory collect a grab sample of your spent fountain solution, representing spent fountain solution you are discharging, and have the sample analyzed for the following, using EPA Methods approin 40 C.F.R. Part 136: EPA Test Method 200.7: Antimony (total); Arsenic (total); Cadmium (total); Chromium (total); Copper (total); Lead (total); Nickel (total); Selenium (total); Silver (total); Zinc (total). EPA Test Method 245.1: Merc (total). EPA Test Method SM 4500H+B: pH. EPA Test Method 625.1: Extractable Organics, and Flow. In addition, it use an <i>alcohol-based</i> fountain solution, please have the sample analyzed for closed-cup flash point.	oved ury
9.	You must provide the results of the analysis for the spent fountain solution grab sample to the MWRA.	
10.	What colors of ink and their brand names were in contact with the analyzed spent fountain solution?	

11. Certification:

I certify under penalty of law that this document was prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated 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.

Name:	Signature:		
Title of Responsible Person:		Date:	
12. Return this form to the MWRA Massachusetts Water Resou	•		
Toxic Reduction and Contr	ol		

Two Griffin Way Chelsea, MA 02150-3334

Chelsea Facility

Attention: G1/C1 Permits

MWRA Industrial User Sampling Chain of Custody/Field Form

SAMPLE TYPE: GRAB For Spent Fountain Solution Mixture Sampling Only

Industry Name: MWRA Permit Number:					
Facility Address:	7004				
Sampling Location Number: Description: Spent fountain	7001	stream			
•	_				
Briefly describe the process(es	s) discharging during s	ample time:			
DISCHARGE TYPE 🗆 🛭	BATCH or C	CONTINU	JOUS		
FLOW on sampling day: Method used to measure/estimat	GP e flow:		e FLOW was:	☐ MEASURED	ESTIMATED
FIELD pH: s.u.(pH mus	t be measured on-site)				
FIELD TEMPERATURE:	FIELD COI	LOR:	FIELD ODOR:		_
SAMPL	E Date (mm/dd/yy):				
GRAB SAMPLE Time (n	nilitary, hh:mm):				
* Preserved=P Field	Preserved=F P	reserved When	Sample Delivered to Lab	D=L	
PARAMETERS Sampled: ()ABN (Extractables Organics)	Type of Preservative Added	Preserved to What pH?	When Was Preservative Added?	Comments: (Y=Yes, N Detected? Amt Na ₂ S ₂ 0 ₃ Added:	l=No) Cl ₂
() Metals**					
**List Metals:					
SAMPLED BY (print name):					
(sign name):					
Sampling Company Name:					
RELINQUISHED BY:			COMPANY NAME:		
DATE:			TIME:		
RECEIVED BY:			COMPANY NAME:		
DATE:			TIME:		
RELINQUISHED BY:			OMPANY NAME:		
TO BE COMPLETED BY	LABORATORY:				
NAME AND TITLE OF THE PE	RSON RECEIVING TH	HE SAMPLE: N	NAME:	TITLE:	
SIGANTURE OF PERSON RE	CEIVING SAMPLE: _				
DATE AND TIME RECEI	IVED BY LABORA	TORY: DA	ТЕ:	TIME:	
DATE ANALYSIS PERFORME	D:				
LABORATORY NAME:			LABORATORY DEP ID) #:	

MAINTENANCE AND SAMPLE LOG FOR PHOTOPROCESSING AND PRINTING OPERATIONS

INDUSTRY NAME:					MWRA Permit No.:			
PERIOD COVEREI	O BY LOG:	THROUG	GH	(each log should cover no	more than one ca	lendar year) PROCESSOR		
NUMBER:	(use se	eparate log for ea	ch processor)					
CARTRIDGE INST	ALLATION AND I	REPLACEMENT	Γ (use letters to ind	icate more than one cartri	idge in a series):			
CARTRIDGE: A	Installation Dat Replacement D							
CARTRIDGE: B	Installation Dat Replacement D							
SILVER HARVEST	TING DATES:	_	CLEANING AND	SERVICING DATES:		NUAL SAMPLE: Date: Result: ve Action:		
		_				AMPLE (IF NECESSARY	7)	
						Date:		
MONTHLY FOUN	ΓAIN SOLUTION N	MIXTURE DISC	HARGES:					
Month/Year	Volume	Month/Year	Volume	Month/Year	Volume			
			_					

pH Log for

Permit holders that discharge from a silver based direct to plate (DTP) and/or computer to plate (CTP) processes Through a pH neutralization system or via batch discharge

Date	Violations? (Yes or No) <5.5 s.u. or >12.0 s.u.	Most Extreme pH of Each Excursion	Duration of Each Excursion (military time)	Comments	Initials
Examples: 9/1/21	Yes	12.8	0910 to 1000	Malfunction of caustic feed; valve repaired	A.B.
9/2/21	No		1100 to 1120	Calibration of meter	A.B.