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SILVER IN WASTES AND IN SEWER DISCHARGES FROM THE PHOTO-FINISHING INDUSTRY

JUN 26 1986

Mr. Peter R. Drew
PME Pty. Ltd.
17A Norfolk Court
Coburg 3058
Melbourne, Australia

Dear Mr. Drew:

This letter is in response to yours dated June 12, 1986 which forwarded information concerning your company's electrolytic silver recovery equipment.

The high recovery rates attributed to your equipment are indeed impressive. I wish you success in marketing this equipment.

Regarding your request for information about EPA limitations on silver discharges for sewer systems. I am unable to comply. I believe you may have some misunderstanding of EPA regulations concerning silver, which I will attempt to remedy.

As you are probably aware, the EPA has established a limit of 0.05 mg/1 of silver in public drinking water supplies. Drinking water containing concentrations of silver above this limit are considered to be unsafe.

Under EPA's hazardous waste program, pursuant to the Resource Conservation and Recovery Act (RCRA), materials which have a silver concentration of 5 mg/1 or higher in the liquid phase or in an extract from the solid phase are considered hazardous waste and are subject to handling and disposal regulations. However, these regulations do not restrict the discharge of hazardous waste to the sewer.

Discharge of materials to the sewer is regulated by the Clean Water Act (CWA) through EPA's Effluent Guidelines

Program. Generally, EPA Effluent Guideline regulations are industry and process specific. In the case of photo-finishing, the Agency has not, as yet, issued a regulation to limit the discharge of used photographic fixers to the sewer. The decision to delay issuance of such regulations is based, in part, on the Agency's belief that current silver recovery practices greatly reduce silver discharges to the sewer.

There are EPA regulations limiting silver discharges to the sewer from metal finishing and electroplating operations. These silver concentration limits are below 1 mg/l.

If you desire additional information of EPA effluent guidelines, I suggest that you contact Marvin B. Rubin (mail code WH-552) in EPA's Office of Water Regulations and Standards.

Also for your information, in case you don't already know, there is a trade association of photographic equipment manufacturers, in the United States. You can contact this association at:

National Association of Photographics
Manufacturers, Inc.
(Attention: Thomas Dufficy)
600 Mamaroneck Avenue
Harrison, NY 10528

Respectfully,

Bernard J. Stoll
Waste Characterization Branch