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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

August 4, 1995

Ms. Orlean Thompson
Senior Environmental Scientist
Corporate Environmental Services
Health, Safety and Environment
Eastman Kodak Company
Rochester, New York 14652-6279

Dear Ms. Thompson:

This is in response to your May 3rd letter to Stephen Bergman of my staff. Both he and Marilyn Goode found the tour that you arranged of the photographic processing facilities at the National Geographic Society to be quite informative.

Based upon past conversations that we have had with you and your attorneys, it appears that it would be useful for me to clarify our policy regarding the regulatory status under the Resource Conservation and Recovery Act (RCRA) of silver recovery units used in photo processing.

A silver recovery unit used to treat photo processing wastewater that exhibits a characteristic is considered to be a characteristic sludge (regardless of whether the sludge is produced as a result of required wastewater treatment) and, as such, is not subject to RCRA regulations when sent for reclamation. A characteristic sludge being reclaimed is not considered a solid waste, according to the provisions of 40 CFR §261.2(c)(3).

Again, thank you for arranging for my staff to visit a silver recovery operation and for your continued efforts to get us the materials that we needed to make an informed determination. If you have any further questions, please contact Stephen Bergman at (202) 260-5944 or Marilyn Goode at (202) 260-6299.

Sincerely,

Michael Petruska, Chief
Regulatory Development Branch

Attachment

Corporate Environmental Services
Health, Safety, and Environment
Eastman Kodak Company
Rochester, NY 14652-6279

May 3, 1995

Mr. Stephen Bergman
United States Environmental Protection Agency
Office of Solid Waste, MC-5304
401 M Street, N. W.
Washington D. C. 20460

Dear Mr. Bergman:

It was with great pleasure that we hosted the visit by you and Marilyn to the photographic processing facilities at the offices of the National Geographic Society on April 27, 1995. Messrs. Allnutt and Curry were especially gracious in displaying all of the different photographic processes which as a matter of course led to the treatment of the used silver-rich fixer and other wastestreams prior to discharge to the POTW. The technologies utilized in all cases were electrolytic recovery and metallic replacement cartridges.

While the driving force of the entire facility was the acquisition of the finest quality images for their customers, it was no doubt apparent that environmentally sound practices remained the underpinning of their operation. Again, the main objective of our visit was to enable you to view the nature of the photoprocessors treatment of their waste streams to meet POTW limits, and the consequent recovery of silver. We hope that this visit has provided you with the background the Agency needs to issue a definitive interpretation that the silver recovery units are characteristic sludges, which when reclaimed, are not solid wastes.

I have enclosed a draft copy of one of a series of documents being prepared for external publication entitled The Technology of Silver Recovery for Photoprocessors. It very clearly explains the chemical reactions which occur in the processes used to recover silver. In the case of metallic replacement, using metallic replacement cartridges or chemical recovery cartridges (CRC), a very rapid oxidation-reduction reaction converts the silver

thiosulfate of the used fixer solution to elemental silver, while the iron of the steel wool is solubilized and is discharged as a thiosulfilbe complex.

If you have any further questions, please do not hesitate to call me at 716-722-1004.

Sincerely,

Orlean I. Thompson, Ph. D.
Senior Environmental Scientist

cc: Marilyn Goode
Michael Petruska