



Enforcement **Alert**

Making You Aware of Anticipated Enforcement Activities

DEP to Conduct a Compliance and Enforcement Sweep of Photo Processing Waste Generators in Hudson County

Who is affected by this initiative?

The enforcement sweep will include any entity that processes photographs on site. The facilities can include, but are not limited to, drug stores, department stores, photographic studios, photo centers, schools, colleges, businesses/medical offices performing x-ray services, and photocopying and duplicating service providers.

Why is DEP focusing on Photo Processors?

The DEP wants to ensure that photo processors are properly managing the waste generated during the photograph-developing process, some of which is considered hazardous.

What is DEP doing?

The DEP, in partnership with the Hudson County Regional Health Commission and the Hudson County Improvement Authority, will be conducting inspections as part of a recycling enforcement initiative in Hudson County in late May or early June. As part of this initiative, the DEP will be conducting inspections at photo processing facilities. These inspections may be unannounced, and any noncompliance noted will be addressed with Notices of Violation and penalties where appropriate.

What should I do?

The following will help ensure compliance, but is by no means a complete list of requirements.

1. Photo processors should make sure they are "counting" the photo processing waste each month when determining their generator status (CESQG, SQG or LQG). "Counting" involves adding up the total weight of all quantities of characteristic and listed waste generated at the facility.
2. Photo processing facilities must know whether they are sending waste to a disposal facility or to a reclamation/recovery facility.
 - a. If you manifest to a treatment, storage and disposal facility (TSD), there are no exemptions.

COMPLIANCE ADVISORY

- b. If you manifest directly to a reclamation facility, there are exemptions. For more information on the exemptions, visit pages 4, 5,8 and 9 of the Web site below.
3. Photo processors should ensure they are in compliance with the appropriate hazardous waste and/or recycling/reclamation regulations when generating, accumulating, recycling or disposing of photo processing wastes. Review your operations for regulatory applicability, necessary permits or DEP approvals.
4. Photo processors should ensure that all employees are thoroughly familiar with proper waste handling and emergency procedures relevant to their responsibilities.

Who should I contact with questions?

Bureau Hazardous Waste Compliance and Enforcement	(609) 584-4250
Hazardous Waste Compliance and Enforcement – Northern Field Office	(973) 656-4470

Where can I get more information?

For more information, visit

www.epa.gov/epaoswer/hazwaste/id/infocus/photofin.pdf

Please note this advisory is intended to be a summary explanation of a department initiative. It does not include all potentially applicable requirements. If you have any questions related to compliance with this initiative, please contact the Enforcement numbers listed above.