Environmental Best Management Practices

For

PHOTO FINISHING OPERATIONS IN THE CITY OF TORONTO

TORONTO Water

CONTENTS

1	INTRODUCTION	
	1.1 WHY IS EFFLUENT FROM PHOTO FINISHING OPERATIONS A CONCERN?	
2	BACKGROUND	
3	SCOPE	4
4	LICENSING	
5	SUMMARY OF REGULATORY REQUIREMENTS	4
	5.1 Federal Government	
	5.2 Provincial Government	
	5.5 MUNICIPAL GOVERNMENT	
6	ONSITE SILVER RECOVERY	6
	6.1 Onsite silver recovery equipment	
	6.2 Standards	
	6.3 INSTALLATION, INSPECTION AND MAINTENANCE	
	6.4.1 Self Monitoring	
	6.4.2 MONITORING BY SUPPLIER/CONTRACTOR	
7	SUBJECT POLLUTANTS	
8	CHEMICAL AND CHEMICAL WASTE LABELLING AND STORAGE	
9	WASTE DISPOSAL AND RECYCLING	
	9.1 HAZARDOUS WASTE DISPOSAL	
	9.2 NON-HAZARDOUS WASTE RECYCLING	
10	SPILL RESPONSE PLAN	
11	RECORD KEEPING AND RETENTION	
12	BEST MANAGEMENT PRACTICES	
	12.1 Employee Awarebess and Education	
	12.2 SPILL RESPONSE	
	12.3 PROACTIVE POLLUTION PREVENTION	
13	IMPLEMENTATION PLAN OF BEST MANAGEMENT PRACTICE	
14	INSPECTIONS, MONITORING, AND ENFORCEMENT	
15	MORE INFORMATION	
16	APPENDIX I - GLOSSARY OF TERMS	14
17	APPENDIX II - LOG OF RECORD KEEPING	

1 Introduction

The City of Toronto's Environmental Monitoring and Protection Unit, within Toronto Water Division, has developed the Environmental Best Management Practices (BMP) for Photo Finishing Operations. Serving as a guide to the sections of the City of Toronto Municipal Code Chapter 681- Sewers that apply to the photo finishing industry, this document provides guidance and information on meeting with the compliance requirements and improving environmental performance for photo finishing business owners/operators to minimize the effects of their operations on the quantity and quality of wastewater and contaminants discharged to sewers.

The City of Toronto Municipal Code Chapter 681- Sewers requires all businesses that use or produce subject pollutants to submit a Pollution Prevention Plan. If a photo finishing operation adopts the guidance of this Best Management Practice and continually meets the requirements of such BMP, the requirement of a detailed Pollution Prevention Plan_is not required under section 681-5.A.. A "Declaration by the Photo Finishing Operations for Implementing Environmental Best Management Practices (BMP)" is still required to be completed and submitted to the City of Toronto to confirm the business' continued adherence to practicing best management in its daily photo finishing activities.

The Best Management Practice (BMP) is intended for guidance purposes only and, in the event of a conflict between the BMP and any applicable Federal, Provincial or Municipal acts, by-laws, regulations, directives or orders (collectively referred to as "Laws"), such Laws take precedence.

1.1 Why is the Effluent from Photo Finishing Operations A Concern?

While a single photo finishing operation might contribute small quantities of substances of concern to a sewer system, collectively the operations of the photo finishing industry as a whole can be a significant contributor. It is therefore critical that each and every photo finishing operation does whatever is economically practical and required to reduce substances of concern that are discharged into sewers.

The potential issues in photo finishing industry are:

- Substances can structurally damage sewer systems by plugging or corrosion (e.g. ironcontaining sludge from silvery recovery process, corrosive effluents).
- If large quantity/high concentrations of pollutants enter sewer systems, photo finishing chemicals can react with other materials/chemicals and release toxic substances (e.g. ammonia, etc.), which can put sewer systems and sewage treatment workers' health and safety at risk. Also corrosive chemicals (base and acid) can kill micro-organisms in the bio-treatment processes and affect the wastewater treatment efficiencies. Therefore, controlling the photo finishing chemicals at the source is for the protection of human health, the environment and structural integrity of the sewer system.
- Silver released from photo finishing operations is a non-renewable and precious material and shall be recovered for recycle and reuse.

2 Background

Generally, sewage, including industrial wastewater, has to be treated before discharge from sanitary sewer systems into aquatic and marine environments such as creeks, rivers, lakes, seas and oceans.

Federal and Provincial governments regulate and limit the quality and quantity of substances of concern discharged into the environment via municipal sewer systems. As a result, municipalities have by-laws within their jurisdictions that control the quality and quantity of those substances discharged into sewer systems by wastewater generators, among which the photo finishing industry is one of them. The objective of the municipal by-law is to prevent or limit discharges so as to:

- to protect public health and safety,
- to protect natural environment, and
- to maintain sewer systems and sewage treatment processes
- comply with Federal and Provincial legislation

3 Scope

This document (BMP) is intended to assist the following groups of photo finishing labs to meet with compliance requirements:

- a retail mini-lab processing location
- a wholesale photofinisher
- a commercial photo-finishing laboratory
- corporate labs, law enforcement labs, institutional labs, and other labs

Pollutants and wastes targeted in this document are:

- **Silver** contained in the photo processing effluents (e.g. spent silver-rich fixers and bleach-fixers),
- Depending on suppler and manufacturer, film and photo paper processing chemicals may contain certain amount of subject pollutants of **zinc**, surfactants such as **nonylphenols** and **nonylphenol ethoxylates**, and other trace substances, which are regulated in the Toronto Municipal Code Chapter 681. It is important that the photo finishing owners/operators do everything practical to reduce the quantities and types of these regulated substances from discharge into sewers, and
- Hazardous wastes and recyclable wastes generated in the photo finishing operations.

4 Licensing

Licensing is not applicable for photo finishing operations operating in the City of Toronto.

5 Summary of Regulatory Requirements

A summary of some, but not all, regulatory requirements pertaining to the photo finishing industry is set out below. This summary is for information purposes only and not to be relied upon. Reference should be made to actual legislation for specific requirements.

5.1 Federal Government

Improper connections to sanitary or storm sewers, or runoff that introduce controlled substances (i.e. pollutants) to local watercourses, may cause a violation of the Federal <u>Fisheries Act</u>. All wastewater shall be directed into sanitary sewer with only stormwater runoff (rain and snow melt) is allowed to enter the stormwater collection system.

5.2 Provincial Government

In Ontario, **Spills** - Part X of the <u>Environmental Protection Act</u> (EPA) imposes certain duties on persons who cause a spill or are in control of a material that is spilled. In addition to containing and cleaning up the spill, they shall also report the spill to the Ministry of the Environment (MOE), the municipality and the owner of the material spilled. The <u>Spills Regulation</u> (O. Reg. 360) defines those duties and rights of parties subject to Part X.

The <u>Ontario Fire Code</u> (O. Reg. 388/97) has specific requirements on the storage, handling and identification of corrosive and oxidizing materials.

Additionally, there is provincial legislation that regulates occupational health and safety in Ontario:

- The <u>Occupational Health and Safety Act and Regulations</u>, which specify duties and responsibilities on employers in charge of workplaces where hazardous materials are used, to ensure safe working environment and to provide workers education programs to prevent them from occupational health and safety risks and hazards.
- The <u>Workplace Hazardous Material Information System (WHMIS) Regulation</u> (O. Reg. 860), which sets out in detail the employer's duties and responsibilities on identifying and labeling hazardous materials in workplace, provision of the material safety data sheets (MSDS) and education to workers.

The Ontario Ministry of Municipal Affairs & Housing has set out the <u>Building Code Act and</u> <u>Regulations</u> and <u>Ontario Building Code</u>, which prescribe mandatory standards for building construction, including construction, plumbing and on-site sewage disposal systems in Ontario.

The Ontario MOE <u>Environmental Protection Act</u> requires that certificate of approval (C of A) shall be obtained prior to construct, alter, extend or replace any plant, structure, equipment, apparatus, mechanism or thing that may discharge or from which may be discharged a contaminant into any part of the natural environment other than water. This requirement applies to photo finishing operation if air emissions from photo processing equipment are discharged into open air environment (visit <u>www.ene.gov.on.ca/air.htm</u> or contact at: 416-325-4000 or 1-800-565-4923).

The Ontario MOE also has set out the <u>General - Waste Management</u> (O. Reg. 347), which requires specific waste disposal and record keeping for designated industrial and hazardous wastes.

5.3 Municipal Government

The sewer use By-law – the City of Toronto Municipal Code Chapter 681 has given the City of Toronto the authority to regulate discharges to sanitary and storm sewers within its jurisdiction. The intent of the sewer use by-law is to protect:

- all aquatic receiving environments including creeks, rivers and Lake Ontario
- public health and safety in Toronto
- sanitary and storm sewer systems
- efficiency of the sewage treatment processes
- biosolids quality; and

• promote responsible waste management practices

5.4 Discharge Prohibition

In addition to the following list (refer to the City of Toronto Municipal Code Chapter 681 for definitions and details), the owner/operator of a photo finishing operation shall not discharge into the sanitary, storm, or combined sewers any waste that is in contravention to Municipal Code Chapter 681, Article I, § 681-2 and § 681-4 as amended from time to time. Photo finishing operations shall not discharge into the sanitary sewer non-domestic waste that contains the prohibited substances listed in § 681-2 A. (3):

- 1. Acute hazardous waste chemicals
- 2. Combustible liquids
- 3. Dyes or colouring materials which may or could pass through a sewage works and discolour the sewage works effluent
- 4. Hauled Waste
- 5. Ignitable waste
- 6. Hazardous industrial waste
- 7. Hazardous waste chemicals
- 8. Severely toxic waste
- 9. Water originating from a source other than the city water supply
- 10. Stormwater as defined by the By-law (the wash area shall be designed to prevent storm water from outside the wash area and roof drain from flowing into sewer connected to a sanitary sewer
- 11. Contaminated ground water as defined in applicable provincial regulation (disposal of treated groundwater into the sanitary sewer requires an authorization from the city.
- 12. Effluents from photo processing and equipment cleaning that has a low pH (<6.0) or high pH (>11.5

6 Onsite Silver Recovery

6.1 Onsite Silver Recovery Equipment

There are a variety of onsite silver recovery technologies and equipment available. Understanding the operational process, amount of effluents, and the silver discharge limit, will help determine the technology (e.g. metallic replacement, electrolytic recovery, chemical recovery, precipitation, evaporation/distillation, or ion exchange) and equipment that are needed by a photo finishing operation owner/operator to recover silver used in its processes. Information provided by industrial associations (e.g. the Photo Marketing Association International – PMAI, visit at <u>www.pmai.org</u>) can help select providers of silvery recovery services. Also equipment supplier/manufacturer can help an owner/operator choose the most suitable silver recovery technology and equipment to suit with the operation's business volume, facility size and layout, and budget.

6.2 Standards

All photo finishing operations that discharge non-domestic photo finishing wastewater (other than from washrooms and kitchen facilities) into a sanitary sewer are required to have silver recovery equipment installed and all spent silver-rich photo finishing effluents (e.g. used fixers, bleaches, bleach-fixers, etc.) flow through the equipment to recover silver prior to the discharge of its wastewater into a sanitary sewer. The silver recovery equipment must ensure that the wastewater discharged from the photo finishing operation does not contain silver in concentrations **in excess of 5 milligrams per litre (mg/L)**.

6.3 Installation, Inspection and Maintenance

The owner/operator of a photo finishing operation is required to:

- Install properly functioning silver recovery equipment. For example, metallic replacement cartridges can provide silver recovery efficiency for most photo finishing operations.
- Obtain published data and information from the manufacturer/supplier with demonstration of the capacity and efficiency of the equipment, also follow the supplier's recommendations for preventive maintenance and keep accurate maintenance records.
- Keep a log to record all of the inspection and maintenance activities.

6.4 Monitoring

The owner/operator of a photo finishing operation shall routinely monitor the silver recovery equipment to ensure recovery efficiency to the requirements of § 681. The monitoring options are self monitoring or monitoring by a supplier/contractor.

6.4.1 Self Monitoring

A photo finishing operation may choose a combination of strip testing and analytical lab testing to monitor silver concentrations in sewage discharge.

- You may need to contact your supplier/installer of silver recovery equipment for recommendations on using test strips. Also staff should be well trained on using test strips.
- Test strips can provide an approximation of silver recovery efficiency. There are two types of test strips available. Paper test strips can test for the presence of silver at concentrations of 1000 mg/L or more. Copper test strips can test whether silver is present in a concentration of 50 mg/L or more. Follow the instructions provided by the test strip supplier to conduct routine and frequent testing. PMAI has provided information on how to test silver which is available for review at its website in the appendix of "Code of Management Practice – Guide for Commercial Imaging" (visit <u>http://www.pmai.org</u>).
- Analytical lab testing shall also be conducted to verify effectiveness and efficiency of the silver recovery equipment. Use licensed analytical laboratories to conduct analytical testing. When collecting sample effluents for analytical testing of silver, ask the lab not to add nitric acid for preserving the sample. Nitric acid causes the silver to precipitate out of solution resulting in an artificially-low silver reading.
- Monitoring with test strips must be done at least weekly. Analytical lab testing shall be conducted at least once per year to verify the efficiency of the system
- All testing results shall be recorded and kept in log book for a minimum of two years (see Appendix II for log book example on how to keep testing results).

6.4.2 Monitoring by Supplier/Contractor

A photo finishing operation may use their equipment supplier or a third-party contractor to monitor silver concentration.

- A written monitoring program must be developed showing the silver recovery equipment is adequately monitored..
- The replacement of the metallic replacement cartridge(s) shall be done in accordance with sound and current scientific principles and practice. A conservative assumption approach involving historical production data and end-of-life analytical data is acceptable to define the correct cartridge replacement time.

• The photo finishing operation, working with their equipment supplier or a third-party contractor, shall at all times be able to document that the silver recovery equipment is operating within the parameters set out in this document and explain how the system works.

7 Subject Pollutants

Wastewater discharged from photo finishing operations, depending on types of films, photo paper and associated processing solutions used, may contain subject pollutants of **zinc**, **alkylphenols**, and **alkylphenol ethoxylates** (e.g. surfactant ingredients such as nonylphenols and nonylphenol ethoxylates), as listed in Municipal Code Chapter 681, Article I, Appendix 2.

The owner/operator of a photo finishing operation shall:

- Choose suppliers and products that can reduce or eliminate such subject pollutant(s).
- Request its suppliers to investigate product formulations and alternatives to reduce or eliminate such subject pollutant(s).

8 Chemical and Chemical Waste Labelling and Storage

The owner/operator of a photo finishing operation shall:

- Ensure that all materials, especially chemicals and chemical wastes, are stored in the proper containers with the correct label in accordance with the appropriate WHMIS procedures. An up-to-date MSDS, available from the product's supplier, should be kept for each hazardous product and displayed as required by WHMIS.
- Follow the supplier's specifications for storing photo-finishing chemicals (i.e. storage height, recommended temperature, etc.) so as to minimize product damage and scrap.
- Store incompatible chemicals separately to prevent cross contamination and chemical reactions. Individual packages/containers of photo-chemistry (e.g. developers, fixers, bleach-fixers and replenishers), if mixed together, can result in strong chemical reactions. Therefore, they shall be separated for safe storage in case of spill or emergency.

9 Waste Disposal and Recycling

9.1 Hazardous Waste Disposal

The hazardous wastes generated in a photo finishing operation may include expired and/or scrap concentrates of:

- developer
- fixer and bleach-fixer
- bleach
- stabilizer
- processing kit, which contains combination of components of developers, fixer, bleachfixer and stabilizer
- acidic solution including acids for equipment cleaning and maintenance

The owner/operator and all staff of a photo finishing operation shall:

- Handle chemical concentrates carefully to avoid contact,
- Ensure all chemicals wastes are properly contained and labeled in case of spill or leak,
- Never pour chemical concentrates down into sewer drains,
- Properly dispose offsite all expired, off-specification or scrap chemical concentrates by choosing MOE-approved and licensed waste haulers and receivers,
- Only spent photo finishing effluents may be discharged into sanitary sewer. Before discharging, the effluents must have silver concentration not in excess of 5 mg/L,
- <u>Never dilute</u> effluents with clean water to lower silver concentration or balance the pH. Dilution for discharge is prohibited by Municipal Code Chapter 681-Sewers and by environmental legislation.

9.2 Non-hazardous Waste Recycling

Recyclable wastes generated in photo finishing operations include recovered silver, used onetime-use cameras, used batteries, expired/scrap films and photo paper containing silver, empty film canisters, plastic cores and cases and packaging materials.

Product manufacturers such as Kodak and Fuji have specific recycling programs to take back recyclable materials and recycle/reuse in productions. Work with product suppliers/distributors to determine methods and channels to recycle and reuse as much as possible. If a photo finishing operation runs business within a large commercial building/unit, check with the property manager to find out if any recycling programs have been established for the whole premise.

Also, the City of Toronto has banned wastes with recycling values from dumping into general garbage. Check the city waste recycling and disposal programs for proper recycling and disposal (visit website at <u>http://www.toronto.ca/garbage/index.htm</u> for details).

Waste Name	Concern or Value	How to Dispose/Recycle	
Hazardous Wastes			
Developer concentrate	High pH	Offsite disposed by MOE approved waste disposal site	
Fixer, bleach-fixer concentrate	Chemical	Offsite disposed by MOE approved waste disposal site	
Bleach concentrate	Chemical	Offsite disposed by MOE approved waste disposal site	
Stabilizer concentrate	Chemical	Offsite disposed by MOE approved waste disposal site	
Acidic cleaning solutions	Low pH	Offsite disposed by MOE approved waste disposal site	
Full and half-full processing kits containing components of developer, fixer, bleach-fixer and bleach	Various	Offsite disposed by MOE approved waste disposal site	
Spent silver bearing effluents	Silver	Recover silver through silver recovery equipment, then co-mingled in holding tank before discharge into sanitary sewer (silver concentration must be = 5 mg/L)	
Spent non-silver bearing effluents	N/A	Co-mingled in holding tank with effluents from silver recovery equipment, then discharged into sanitary sewer	
Empty processing kits	Chemical residue	Rinse all chemical containers (must be residue free) and then dispose into general garbage	

The below table lists the majority of frequently generated hazardous and non-hazardous wastes that shall be properly disposed and recycled by photo finishing operations:

Non-hazardous Wastes			
Recovered silver	Silver	Commercial recycler, or manufacturer sponsored recycling program	
Expired/scrap silver-rich film, and photo paper	Silver	Commercial recycler, or manufacturer sponsored recycling program	
Used one-time-use cameras	Camera	Manufacturer sponsored recycling program	
Empty film canisters	Metal	Manufacturer sponsored recycling program, or local recycling bin	
Film plastic cores and cases	Plastic	Local recycling bin	
Used batteries	Battery	Manufacturer sponsored recycling program, or recycling programs supported by the City of Toronto	
Corrugated packaging materials	Paper	Commercial recycler, or local recycling bin	
Used digital photography equipment	E-waste	Manufacturer sponsored recycling program, commercial or city-supported electronic waste recycling program	
Office recyclables (i.e. aluminum cans, paper, glass/plastic bottles, etc.)	Various	Local recycling bin	
Processed film tails	N/A	General garbage	
Processed photo paper	N/A	General garbage	
Organic food and degradable wastes	N/A	Compost as much as possible, if not, general garbage	
Other office garbage	N/A	General garbage	

10 Spill Response Plan

The owner/operator of a photo finishing operation shall ensure that:

- All the staff in the lab knows the products, associated potential health & safety risks and environmental impact, and necessary personal protection equipment (PPE) in response to a chemical spill. Products such as fixers and bleach-fixers-can react with strong acids or bases such as household bleach to release toxic vapors/fumes including chlorine gas.
- The facility has an up-to-date and regularly tested spill response plan.
- The following information should be included in the spill response plan:
 - An inventory of all the chemicals and quantities stored/used in the facility;
 - A floor plan showing the location of all chemicals, floor drains, fire extinguishers, exits, and spill response supplies including spill absorbents and personal protective equipment (PPE);
 - A description of the containment used for silver recovery cartridge, mixing tanks, chemical storage, and any other containers that could leak or spill; and
 - Emergency/spill response procedure including emergency contact person and number, spill response team, internal and external resources as needed.
- The spill response plan is easy to access and spill response equipment and supplies are kept in stock at all times.
- Spills can be properly and immediately cleaned up.
- Spills reaching the sewer system must be reported to the Toronto Water per the Municipal Code Chapter 681-Sewers

11 Record Keeping and Retention

The owner/operator of a photo finishing operation shall ensure that:

- Up-to-date written records of site activities (e.g. Spill Response Plan, a copy of completed and signed Declaration by the Photo Finishing Operations for Implementing Environmental Best Management Practices (BMP), etc.) are kept to show due diligence and to demonstrate that best management practices have been followed.
- Accurate and up-to-date inspections and maintenance records (a sample log sheet is included for reference in the Appendix) are kept for onsite silver recovery equipment for a minimum period of two (2) years from the date of inspection and/or maintenance. The record should include:
 - dates of inspection or maintenance,
 - description of inspection or maintenance, and
 - types and quantities of materials removed from the photo finishing operation.
- Waste manifests-used for waste disposal, and/or shipping documents if manifest not required under exemptions.

12 Best Management Practices

In addition to the requirements specified in the Sections 4 to 11 of this BMP, this Section defines the Best Management Practices (BMPs) that can assist to reduce the discharge of pollutants, comply with regulations and improve overall environmental performance. All these BMPs are based on the Pollution Prevention (P2) principle that emphasizes reducing or eliminating pollutants and toxic materials at source rather than removing them from a mixed waste stream or through treatment processes. Preference should be given to practices in the following pollution prevention hierarchy (the lower number, the higher hierarchy):

- 1. Avoidance, elimination or substitution of polluting products or materials
- 2. Reduction in the use of polluting products or materials
- 3. Elimination and reduction of the generation of polluting by-products
- 4. Re-use and recycling of polluting by-products
- 5. Energy recovery from polluting by-products
- 6. Treatment or containment of polluting residual by-products
- 7. Remediation of contaminated sites.

Specifically for photo finishing operations, the following best practices have been specified to help decrease the contaminants discharge, meet with compliance, improve operation efficiency and save costs through implementing the above pollution prevention theories. Owners/ operators are also encouraged to influence their suppliers by requesting more environmentally friendly products or alternatives and purchasing from suppliers who take materials and substances back for recycling and reuse.

12.1 Employee Awareness and Education

The owner/operator of a photo finishing operation shall ensure that all employees:

- are well trained in using existing and new equipment and processes, and are aware of the "best available technologies (BAT)" or the most practical technologies suitable to the lab's business operations,
- are familiar with the health and safety hazards associated with the products and processes (WHMIS), and the potential environmental pollution/impact,
- understand the purpose of spill response plan and are properly trained in spill response, and

 have ready access to Material Safety Data Sheets (MSDS) of all the products being used, and know the location of spill response materials and personal protective equipment (PPE).

12.2 Spill Response

The owner/operator of a photo finishing operation shall:

- Implement a spill response plan (See section 10 in this document for details).
- Report a spill to provincial and municipal authorities if a spill occurs and chemicals have entered natural environment and/or sewer systems:
 - Ministry of Environment 24-hour reporting number: 416-325-3000
 - Toronto Water 24 hour reporting number: 416-338-8888
- When responding to a spill, separate incompatible damaged products and soaked absorbents after clean-up of leakage or spill to prevent chemical reactions. MOE "General – Waste Management" (O. Reg. 347) requests of proper waste classification and packaging for waste transportation and disposal.
- After spill clean-up, the facility should be inspected and verified that the spill was cleaned up if necessary before resuming wastewater discharge from the operations.

12.3 Proactive Pollution Prevention

Some simple and inexpensive pollution prevention can produce effective results:

- **Preventive Maintenance**: this may be the first option of pollution prevention. Implement maintenance recommendations specified in the equipment operating manual and/or from the equipment supplier so that the equipment can work at optimal level and keep waste at a minimum.
- **Process Control**: follow the equipment and product specifications to monitor variables that affect the quality and efficiency so as to ensure that the photo processors function under best conditions. The variables may include: chemical mixing ratio, replenishment rates, and processing temperatures.
- **Inventory Control**: manage the chemical inventory includes rotating the stock to ensure first in, first used. Maintain an appropriate stock level so as to reduce the risk of high scrap and expiry, and save storage space and inventory cost.
- **Storage and Containment**: all chemical wastes shall be shipped offsite for disposal as soon as possible. In addition to proper labeling, all chemicals and chemical wastes shall be stored with secondary spill containment, especially when handling large quantities. Also the storage areas, whether indoor or outdoor, shall not be connected directly or indirectly to a sanitary sewer or storm sewer.
- **Good Housekeeping**: a clean and orderly photo finishing lab has better control over materials, chemicals and equipment and less likelihood of spill, which results in less operational wastes and more pollution prevention.

12.4 Digital Technology

The digital trend in photographic industry has introduced digital cameras, non-silver halide based printing methods and other computer associated technologies. The owner/operator of a

photo finishing operation shall recycle digital electronic wastes including used digital cameras, digital printers and computer equipment through supplier sponsored and/or local recycling programs.

13 Implementation Plan of Best Management Practice

The implementation plan of this document by the City of Toronto includes the following components:

- Education
- Industry/Business' Adoption and Practice
- Inspection
- Monitoring
- Enforcement
- Administration
- Review and Update

14 Inspections, Monitoring, and Enforcement

The City of Toronto's Environmental Monitoring and Protection Unit and Provincial Offences Officers may carry out inspections and examination of records or other documents. The inspector may take samples of effluent for analysis as specified under the City of Toronto Municipal Code Chapter 681. **Corrective measures will be imposed** by the inspector/officer if it is determined that the BMP implementation procedures are not being properly followed. Where corrective measures are not being met with the requirements of Pollution Prevention, approval for this BMP can be revoked and a full Pollution Prevention Plan per section 5 of Municipal Code Chapter 681-Sewers shall be required within 90 days.

Any offences under the Municipal Code will be enforced as per the provisions in § 681-14 Offences. The current maximum fine for non-compliance with sections 2, 3 & 4 is \$20,000 forIndividuals and \$100, 000 for corporations. For all others sections the maximum fine is \$5000 for every day of the offence.

15 More Information

For more information about the BMP, please contact:

City of Toronto – Toronto Water Division Environmental Monitoring & Protection Pollution Prevention Group Email: <u>p3help@toronto.ca</u>

For <u>reporting</u> of spill, illegal discharge and dumping into Toronto sewers or waterways, nondrinking water quality complaints or concerns, and discoloured discharge from storm sewer outfalls, call Toronto Water's 24-hour Spill & Complaint Reporting Centre at **416-338-8888**.

16 Appendix I – Glossary of Terms

Best Management Practice (BMP): Best Management Practices (BMP) means an integrated plan to control and reduce the release of restricted and prohibited waste into the sewage works to a practicable extent and in accordance with applicable Laws, through methods including physical controls, pre-treatment processes, operational procedures and staff training.

Bleach: A chemical bath to convert the black metallic silver that forms a photographic image into a compound such as silver halide, which performs three functions: (1) Stops the action of the developer by lowering the pH, (2) Oxidize the insoluble, light sensitive silver halide so that it can react with the bleach to form a soluble silver compound, and, (3) Converts any incompletely formed dye into visible dye.

Bleach-Fixer: A chemical bath in which bleach and fixer haven been combined in colour processing which performs several functions: (1) Stops the action of the developer by lowering the pH, (2) Oxidize the insoluble, light sensitive silver halide so that it can react with the bleach to form a soluble silver compound, (3) The ammonium or sodium thiosulphate dissolves the silver halides so that they can be removed from the paper either in the bleach fixer or the final water wash, and, (4) Completes the formation of the cyan dye.

Contaminant: A substance that is not naturally present in the environment or is present in elevated amounts, which, if in sufficient concentration, can adversely affect human health, flora, fauna and/or the environment.

Developer: A weak reducing alkaline solution that is used during the first step in creating an image on light sensitive medium (film or photo paper). In this step the developing agent acts upon all the exposed silver halides to convert them to visible black metallic silver.

Effluent: Liquid flowing out from a facility or household into a sewer system or water body.

Fixer: A thiosulphate solution used to dissolve the remaining unexposed silver on the film. The dissolved silver leaves the emulsion and remains in the fixing bath solution.

Heavy metals: Metallic elements with high atomic weights, such as silver, iron, zinc, copper, lead, mercury, cadmium and arsenic. They are generally persistent in the environment, have the potential to accumulate in the food chain and sewage treatment plant sludge and can cause health effects in organisms.

Milligrams per Litre (mg/L): The weight of a substance in milligrams in one litre of wastewater (may also be referred to as parts per million or ppm).

Mini-Lab: An establishment having a colour and/or black and white film processor and a combined paper printer and processor, capable of providing onsite photographic film and paper processing and printing services to the general public.

MSDS: Material Safety Data Sheet

Pollution Prevention: The use of processes, practices, materials, products or energy that avoids or minimizes the creation of pollutants and wastes, at the source.

Photo Finishing: A sequence of chemical treatments or baths that convert a latent image in a photographic emulsion into a stable and visible one, and, then if applicable, transfer it to a receiving material.

Processing Kit: A combination of components of developer, acidic stop bath, fixer, bleach, and/or bleach-fixer/bleach, which are assembled and packed as a whole package that is ready-to-use by plugging onto the photo finishing equipment.

Sanitary Sewer: A collection system for domestic, commercial, institutional and industrial wastewater or any combination thereof.

Spill Containment: Any impervious structure that surrounds a container or works that is sufficient to hold the larger than 110 per cent of the largest volume of free liquid in the container or works or 25 percent of the total volume of free liquid in storage.

Spill Response Plan: A written plan developed by the operator to respond to any spills at photo finishing operation site. As a minimum, the plan should define the roles and responsibilities for spill response, contact names and numbers for the appropriate agencies, and a checklist of all spill response equipment.

Stabilizer: A solution that is used to preserve the colour film dyes against oxidation and ultraviolet degradation.

Standard Methods: The latest edition of *Standard Methods for the Examination of Water and Wastewater* jointly prepared and published from time to time by the American Public Health Association, American Water Works Association, and the Water Environmental Federation.

Storm Sewer: A pipe conduit, drain or other equipment or facilities for the collection and transmission of stormwater or uncontaminated water.

Wastewater: The spent or used water of a community or an industry.

WHMIS: The Workplace Hazardous Material Information System.

17 Appendix II – Log of Record Keeping

RECORDS OF	BEST MANAGEMENT PRACTICES
-------------------	---------------------------

Date	Inspection/Maintenance Activity	Remarks	Conducted By
	7		
		V.T.	

I. Silver R	I. Silver Recovery Equipment & Spill Response Plan			
Date	Inspection/Maintenance Activity	Remarks	Conducted By	
Dec-31/05	Initial installation	Installed by ABC Company	F_Name L_Name	
Jan-31/06	Monthly routine equipment inspection	Inspection passed	F_Name L_Name	
Feb-15/06	Quarterly spill response inspection	Containment intact, absorbent and PPE available	F_Name L_Name	
Feb-20/06	Verify MSDSs of all chemicals	MSDSs are all available onsite and up-to-date	F_Name L_Name	
Mar-30/06	Equipment preventive maintenance	Silver recovery cartridge replaced	F_Name L_Name	
		~		

RECORDS OF BEST MANAGEMENT PRACTICES - Example

II. Silver Concentration Test				
Date	Silver Concentration Test	Silver Concentration	Conducted By	
	\square			
	TO X K2 H HAA			
	(D) Hand			

RECORDS OF BEST MANAGEMENT PRACTICES

Note: 1. Approximation silver test is conducted by using test strips. 2. Exact analytical analysis is conducted at licensed analytical lab.

RECORDS OF BEST MANAGEMENT PRACTICES - Example

II. Silver Concentration Test			
Date	Silver Concentration Test	Silver Concentration	Conducted By
Dec-24/05	Weekly paper (or copper) strip test	Silver = 0.5 mg/L	F_Name L_Name
Dec-30/05	Weekly paper (or copper) strip test	Silver = 0.6 mg/L	F_Name L_Name
Dec-30/05	Also sampling for silver analysis at licensed ABC Analytical Lab	Silver = 0.65 mg/L in analytical report received on Feb-28/06.	F_Name L_Name
		ADDZ	

Note: 1. Approximation silver test is conducted by using test strips. 2. Exact analytical analysis is conducted at licensed analytical lab.

RECORDS OF BEST MANAGEMENT PRACTICE	ES
--	----

III. Waste Disposal and Recycling			
Date	Waste Type	Quantity and Remarks	Conducted By

Note: Hauler and receiver that remove hazardous wastes from this facility for treatment and/or disposal must be licensed and approved by MOE in accordance with the General - Waste Management (O. Reg. 347)

RECORDS OF BEST MANAGEMENT PRACTICES - Example

Date	Waste Type	Quantity and Remarks	Conducted By
Mar-30/06	Recovered silver recycled at ABC Silver Recycling Company	10 kilograms – Shipping Doc. #	F_Name L_Name
Jan-01/07	Hazardous wastes disposed at XYZ Disposal Company (MOE licensed)	200 litres – Manifest #	F_Name L_Name

Note: Hauler and receiver that remove hazardous wastes from this facility for treatment and/or disposal must be licensed and approved by MOE in accordance with the General - Waste Management (O. Reg. 347)