

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

JUNE 10, 1987

Ms. Beverly Brookshire, Staff Architect
Building and Service Section
Federal Deposit Insurance Corporation
Washington, DC 20429

Dear Ms. Brookshire:

This is in response to your letter of May 21, 1987. The answers to your specific questions are as follows:

- (1) You will have to contact the District of Columbia to find out if the darkroom drains to a publicly owned treatment works (POTW), i.e., the Blue Plains Facility.
- (2) If the darkroom does drain (along with domestic sewage, i.e., untreated sanitary wastes) to a POTW, then the photo chemicals are not solid waste, and not hazardous waste. See 40 CFR §261.4 (a)(1).

If you have further questions, please contact Mike Petruska of my staff at 382-4765.

Sincerely,

Marcia Williams
Director
Office of Solid Waste

FaxBack# 11254

May 21, 1987

Ms. Marsha Williams, Director
Office of Solid Waste
U. S. Environmental Protection Agency
401 M Street, S. W.
Washington, D. C. 20460

Dear Ms. Williams:

The Federal Deposit Insurance Corporation is planning to set-up a dark room in our building located at 1776 F Street, N. W., Washington, D. C. Before doing so, it would be appreciated if we could have the following questions answered:

1. Does this drainage system discharge to a Publicly Owned Treatment Works?
2. Since our consumption rate is approximately 6600 (100's) cubic feet per year (annualized based on last 88 days usage of 1584 cubic feet), should the discharge of photo chemicals be considered hazardous waste or would we be excluded per section 261.4A12, ii?

It would be appreciated if you could direct your response to Ms. Beverly Brookshire, Staff Architect. If you have any questions, she may be reached at 898-7307.

Sincerely,

J. David Shaffer, Chief
Building & Services Section