



## Treatment and Disposal of CTP Plate Developers

This document provides information on disposal of Kodak's Graphic Communications Group (Kodak GCG) CTP and positive printing plate effluents.

### Regulatory Issue Summary

- The disposal of printing plate effluents is regulated by environmental regulations under the Clean Water Act (CWA) and the Resource Conservation and Recovery Act (RCRA).
- According to federal RCRA waste management regulations, permits may be required to treat waste and regulations vary among states.
- Sewer use laws may limit or prohibit discharges of CTP and Positive plate developers on a local level.
- Local municipal governments own and regulate the wastewater collection and treatment system, including all the pipes. To protect these systems, municipalities regulate industrial discharges via the municipal sewer ordinance.

To find your local sewer discharge limits go to <http://www.pmairegs.com/sewer/>.

### Treatment and Disposal Options

CTP plate developers (except Negative Plate Developer 956 and 980 Plate Developer) typically have high pHs. The wastes of these developers, including processor overflows, must be managed accordingly. In some products, the pH of the wastes is at or above the RCRA definition of a hazardous waste, pH 12.5 or greater.

Note: While pH is typically the only parameter of concern in the CTP developer effluent, municipal wastewater authorities regulate other parameters found in these effluents.

These waste streams can be handled in one of four ways:

1. *Discharge directly to the sanitary sewer system.*

Waste streams that have a pH at or above 12.5 may meet the RCRA exclusion documented in 40 CFR 261.4 (a)(2). This discharge can only be done with the notification and permission of the receiving Sewerage Authority. An industrial wastewater permit is required allowing the discharge.



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### *2. In-line elementary neutralization.*

Equipment is available to neutralize the wastes as they exit the processor, including batch discharges. For information on the Automatic Neutralization System (ANS), call the EnviroServices Hotline at 1-877-574-7274. Refer to the Elementary Neutralization Reference Chart for state specific acceptability regarding RCRA waste management permitting and confirm with your state to ensure the regulations have not changed. Additional permitting may be required; check with your receiving Sewerage Authority.

### *3. Off-line elementary neutralization.*

The overflows and batch discharges are collected separately and then neutralized before release into the sanitary sewer. Refer to the Elementary Neutralization Reference Chart for state specific acceptability regarding RCRA waste management permitting and confirm with your state to ensure the regulations have not changed. Additional permitting may be required; check with your receiving Sewerage Authority.

### *4. Collection and Haul Away Service.*

If none of the above options are acceptable, collection and haul away is necessary. Wastes with a pH at or above 12.5 must be managed as hazardous waste. A corporate discount is available with Safety-Kleen for Kodak customers. Contact the EnviroServices Hotline at 1-877-574-7274 or email [PEP@kodak.com](mailto:PEP@kodak.com) for set-up.

Helpful Information:

For info on common misconceptions in the printing business:

<http://www.metafix.com/products/graphicarts/EPA-OSHA-CommonMisconceptions.html>

Clean Water Act:

<http://www.epa.gov/region5/water/cwa.htm>

Resource Conservation and Recovery Act:

<http://www.epa.gov/epaoswer/general/orientat/>

State Environmental Agencies:

<http://www.epa.gov/epahome/state.htm>

Info on Neutralization Units:

<http://www.metafix.com/products/graphicarts/productsGA.html>

<http://www.cpacimaging.com/silvrecneutral.asp>



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## *State Specific Applicability for Neutralization of a RCRA Corrosive Hazardous Waste\**

Determine your specific state and local regulatory requirements regarding elementary neutralization of a hazardous waste prior to disposal. See the list of states below for initial reference.

NOTE: Some states require special permits, as well as additional record keeping and reporting requirements for elementary neutralization of a hazardous waste.

### States that follow U.S. EPA Federal Regulations, allowing elementary neutralization:

Alabama	Hawaii	Kansas	New Mexico	Tennessee
Alaska	Idaho	Kentucky	North Carolina	Texas
Arizona	Illinois	Louisiana	North Dakota	Vermont
Arkansas	Indiana	Maryland	Ohio	Virginia
Connecticut	Iowa	Michigan	Oklahoma	West Virginia
Colorado	Florida	Mississippi	Oregon	Wyoming
Delaware	Georgia	Nebraska	South Dakota	

### States that DO NOT follow U.S. EPA Federal Regulations for elementary neutralization. Elementary neutralization may not be allowed; may require permits:

California	Massachusetts	New Hampshire	Rhode Island	Washington
Maine	Minnesota	New Jersey	Utah	Wisconsin

### States that allow elementary neutralization but have additional requirements, i.e. reporting and recordkeeping requirements:

Missouri	New York	Pennsylvania	South Carolina
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*\* Please note that that these regulations are subject to change and you should always check with your state to determine the current status of the elementary neutralization regulations before treating your waste.*



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## More Information

This service is part of Kodak's Printer's EnviroServices Program (PEP). Helping customers with environmental concerns and compliance is a major commitment of Kodak. PEP consists of a comprehensive range of environmental and safety products and services specially designed to allow Kodak's GCG customers to meet their environmental, safety, and health objectives in a cost-effective manner. For more information, please contact the Kodak EnviroServices Hotline at (877) 574-7274 or [PEP@kodak.com](mailto:PEP@kodak.com).

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Eastman Kodak Company • Graphic Communications Group • Health, Safety & Environment  
EnviroServices Hotline: +1.877.574.7274 (US and Canada) or +1.770.232.2133 (Int'l) • Email: [PEP@kodak.com](mailto:PEP@kodak.com)