

ORH-707: Guidance on Film Processing Chemicals - Disposal or Reclamation Reissued Dec. 5, 2018

This guidance applies to all facilities in the healing arts that use film processing for developing radiographic films, and supersedes an internal memorandum dated April 9, 1991.

Concerns regarding the disposal of chemicals used in the processing of radiographic film are related to the chemical nature of the film processor fluids, specifically the heavy metal toxicity associated with silver. Film processing chemicals do not become radioactive with use in the radiography facility. Facilities have two options for getting rid of film processing chemicals: Disposal or Reclamation.

Disposal

The Department of Environmental Quality's (DEQ) Waste Division has promulgated regulations affecting small volume generators of film processing chemical waste, which is defined as less than 20 gallons per month. Businesses may dispose of less than 20 gallons per month into the local sewer system, only if they have permission from the local waste treatment plant. Disposal into a septic system is not permissible.

Reclamation

Facilities may also consider recycling the chemicals to reclaim the silver, which may have some economic value depending on the market value of silver. Large generators may consider this approach. Smaller facilities may consider asking the vendor providing the film processing chemicals if they have either a disposal program or a recycling program.

Questions

Further questions regarding disposal of film processing chemicals should be directed to Virginia Department of Environmental Quality, Office of Technical Assistance, Waste Division.

Published By: Virginia Department of Health, Office of Radiological Health, 109 Governor Street, Room 733, Richmond, VA 23219. Questions and comments should be directed to the X-Ray Program at (804) 864-8150. ORH-707