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**NEW MEXICO
ENVIRONMENT DEPARTMENT**

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James C. Kenney
Cabinet Secretary

Jennifer J. Pruett
Deputy Secretary

CERTIFIED MAIL – RETURN RECEIPT REQUESTED

November 25, 2019

Roxanne Segura, RT(R), MBA
Manager
El Camino Imaging Center
8020 Constitution Pl. NE
Albuquerque, NM 87110

**RE: NOTICE OF VIOLATION AND RESOLUTION
EL CAMINO IMAGING CENTER
EPA ID# NMD982553448**

Dear Ms. Segura:

On November 4, 2019, the New Mexico Environment Department ("NMED") conducted a hazardous waste compliance evaluation inspection ("Inspection") at El Camino Imaging Center ("ECIC"), located at 8020 Constitution Place NE, Albuquerque, New Mexico. ECIC provides magnetic resonance scanning, radiology and general X-ray services. ECIC generates damaged or expired hazardous waste pharmaceuticals and universal wastes.

Based on observations and review of the information obtained, NMED has determined that ECIC is a Very Small Quantity Generator of hazardous waste as defined in 40 Code of Federal Regulations 262.13. Furthermore, NMED has determined that ECIC has violated the New Mexico Hazardous Waste Management Regulations (HWMR) 20.4.1 New Mexico Administrative Code ("NMAC") as specified below.

NMED Inspectors observed the following violations:

1. Failure to contain, label and demonstrate the length of time universal waste fluorescent lamps had been accumulating, which are violations of 20.4.1.1000 NMAC, incorporating 40 CFR 273.13(d)(1), 273.14(e), 20.4.1.1001(B) NMAC and 273.15(c) respectively. Specifically, NMED Inspectors observed approximately ten U-shaped lamps and a couple of 3-ft lamps which were stored loosely, without labels and with no way to demonstrate the length of time the lamps had been accumulating. The lamps were located in the Mechanical Room.

NMED has determined that the violations were corrected at the time of the Inspection; therefore, no further action is required.

This Notice of Violation is considered an informal enforcement response in accordance with NMED's Enforcement Response Protocol. Please be aware that any future substantial deviations from regulatory requirements may result in ECIC being considered for an elevated enforcement action. Also, be aware that any corrective action taken during our Inspection, or in response to this letter, does not relieve ECIC of its obligation to comply with any and all other applicable laws and regulations.

If you have any questions regarding this letter, please contact Don Meyer of my staff at 505-476-6021 or by email at don.meyer@state.nm.us.

Sincerely,



for Stephanie Stringer, Director
Resource Protection Division

SS:dm

cc: Don Meyer, NMED HWB
Janine Kraemer, NMED HWB
John Rhoderick, NMED District I Manager

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