



**NEW MEXICO
ENVIRONMENT DEPARTMENT**



Hazardous Waste Bureau

2905 Rodeo Park Drive East, Building 1

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**HAZARDOUS WASTE COMPLIANCE
EVALUATION REPORT**

Evaluation Type: CEI CAV Other Date: 8/19/2016 Time of Entry: 0950
 Facility: Goodrich ISR systems EPA ID #: NM0035686823 State ID#: 2422
 Location: 6600 Gulton Court NE, Albuquerque, NM 87109 Mailing Address: Same as location
 Business Owner: United Technologies Corporation Property Owner: Dominique Morel; Morel LLC
 Facility Representative/Contact: [Signature] Title: Operations Manager

Entry Conference:

- Present credentials to facility representative
- Cite authority to enter site, conduct inspection, obtain samples, take photos (NMSA § 74-4-4.3)
- State reason(s) for and nature of inspection
- State objectives and procedures for inspection

Participants (Print):

Name	Title	Email address	Phone #
Aaron Coffman	Environmental Scientist	aaron.coffman@state.nm.us	505-476-6019
Don Meyer	Environmental Specialist	don.meyer@state.nm.us	505-476-6021
Rip Winckel	EHS Manager	rip.winckel@utas.utc.com	505-938-5117
Burl Lewis	Facilities Manager	burl.lewis@utas.utc.com	505-362-3907

DATE OF LAST INSPECTION: 06/19/2001

CHECKLISTS COMPLETED: CESQG SQG <90 Day Used Oil Other: _____**History, Size and Nature of Business:**

Goodrich ISR Systems is a manufacturer of space vehicle data acquisition electronics. The facility has been in operation at this address since 1979, and currently employs 65 people. The facility is currently operated by United Technologies Corporation, a parent company. The building is approximately 86,000 square feet in size. Business hours are 8-5 Monday through Friday. This facility is in the process of closure and expects to begin decommissioning the property in November 2016.

Process Description

Goodrich ISR Systems assembles circuit boards and electronic components using individual workstations where employees hand-assemble components, and/or through the use of soldering machines for larger circuits. Once assembled, most circuit boards are cleaned off using a bath of axarel and ethanol solutions. These cleaning baths are periodically changed and handled as hazardous waste. There are also conformal coating workstations where humiseal aerosol cans are used to apply a protective coating to some circuit boards. The facility also houses an environmental testing lab for subjecting electronics to field conditions, a destructive analysis lab to determine defects, and x-ray machines for quality assurance. The wave solder machine generates lead dross, which is recycled locally. Individual work stations use a variety of solvents during assembly, soldering, and cleanup, including axarel, isopropyl alcohol, and toluene. Rags and wipes from the individual workstations are collected as hazardous waste in step cans. Other wastes that may be generated include spent aerosols and, very rarely, wastes from cleaning out soldering and coating machines.

Waste Streams

Waste stream	Waste code	Process, location, container size	Transporter & EPA id # and TSDF w/ EPA id	Monthly generation
Flammable liquids, circuit board cleaning solvents	D001, D035, F003, F005	Spent solvent from the axarel/ethanol bath, or from pan-washing workstations. Pan-washing spent solvent is stored in a 5-gallon flammable liquids container SAA. Consolidated into 55-gallon drums and stored at <180-day storage area.	Transported using Advanced Chemical Transport (EPA# CAR000070540), sent to Veolia ES Technical Solutions (EPA# COD980591184)	300-400 lbs.
Solids containing flammable liquids	D001, D007, D008, D035	Wipes, rags, and other refuse that come into contact with circuit boards and are used with solvents. Also includes spent humiseal aerosol cans. Stored at workstations in small 1-10 gallon SAA containers/step cans, and consolidated into a cubic yard box at the <180-day storage area.	See above	70-125 lbs.
Mercury-containing e-waste	D009	E-waste that contains mercury switches, and is not accepted by Albuquerque Recycling Inc. who would normally take e-waste. Managed as Universal Waste in 55-gallon drums once identified.	See above	150 lbs.
Solder dross	D008	Periodically cleaned out from the wave solder machine	Rudy's Downtown Recycling (no EPA#)	<10 gal ~125 lbs.
Spent Lamps	D009	Stored in Veolia boxes	Recycled via Veolia	<1

Results of Inspection

NMED inspectors met with EHS Manager Rip Winckel, Facilities Manager Burl Lewis, and Manager Joe Scotto, conducted an opening conference, and performed a walkthrough of the facility and waste storage areas. Inspectors observed the waste producing processes as well as several Satellite Accumulation Areas, as well as evaluating the central waste accumulation area. Disposal documentation was reviewed following the walkthrough. The facility was determined to be a Small Quantity Generator based on manifests and the amount of waste presently on-site. One container at the central accumulation area was found open, and the proper postings for the front desk were not present.

Summary of Potential Violations

Please be advised that this list may not be inclusive and additional violations may be added after reviewing notes, pictures and documents.

a) **Regulation: 40 CFR 262.34(d)(2), referring to 40 CFR 265.173(a) – Hazardous waste container closure at the <180-day storage area**

The cubic yard box containing hazardous waste wipes, rags, and other solids was observed to be open during inspection of the <180-day storage area, and was not receiving waste at the time. Although a wooden board had been placed on top of the box, this does not constitute closure under RCRA definitions. Hazardous waste containers are required to be closed when not receiving waste or having waste removed.

b) **Regulation: 40 CFR 262.34(d)(5)(ii)- Emergency response information postings**

The front desk personnel did not have a copy of the required postings available. RCRA regulations require that Small Quantity Generators of hazardous waste post the name(s) and phone number(s) of the Emergency Coordinator(s); locations of emergency equipment including fire extinguishers, alarms, and spill equipment; and the phone number of the fire department, by the facilities' main phone. During the inspection, inspectors were unable to locate any postings that met these three criteria that were stationed by a phone. In the case of this facility, the best place for the required posting may be the front security desk. This work station did not have the required posting during the inspection.

Best Management Practices

- a) Recommend re-labeling the flammable liquid container receiving waste from the pan-washing workstation.
- b) Recommend correcting the labels on the drums of Universal Waste to clearly state the material is being managed as Universal Waste.
- c) Recommend re-organizing the <180-day storage area to ensure clutter does not restrict access to emergency equipment

EPA ID NM0035686823
 Facility Name Goodrich ISR systems
 Date 8/15/16

Exit Conference:

Time of Exit: 11:40 on 8/17/16

Discussion/Explanation of Potential Violation(s):

Explain Review Process by NMED/HWB Management:

NMED Anticipated Timetable for Possible Enforcement Action(s):

Explain Availability of On Site Technical Assistance: N/A

 Advised Facility Representative at the time of inspection, no potential violation(s) of 20 NMAC 4.1 were identified. Also, explained that Facility remains obligated to comply with all applicable laws and regulations.

Advised Facility Representative of the potential violation(s) identified during the inspection. Explained that in accordance with § 74-1-10 NMSA 1978 (Repl. Pamph. 2000), NMED may: (1) issue a notice of violation requesting voluntary compliance within a specified time period; (2) issue a compliance order requiring compliance immediately or within a specified time assessing a civil penalty for any past or current violations of up to \$10,000 per day of noncompliance with each violation or both; or (3) commence a civil action in district court for appropriate relief, including a temporary or permanent injunction. Any such order issued may include a suspension or revocation of any permit issued by NMED.

Participants:

Name	Signature	Title	Phone#
Aaron Coffman	<i>Aaron Coffman</i>	Env. Scientist	505-476-6019
Don Meyer	<i>Don Meyer</i>	Env. Specialist	505-476-6021
Rip Winkel	<i>Rip Winkel</i>	EMS MGR	505-362-3609
Joe Scotto	<i>Joe Scotto</i>	Operations Mgr	203-494-3637
Burl Lewis	<i>Burl Lewis</i>	Facilities Mgr	505-938-5522

SMALL QUANTITY GENERATOR CHECKLIST

FACILITY: Goodrich ISR Systems

DATE: 8/15/16

EPA ID#: NMPO35686723

INSPECTOR: AC

Citation	GENERAL	SQG		
		yes	no	n/a
262.11	Waste determination made	yes <input checked="" type="checkbox"/>	no <input type="checkbox"/>	n/a <input type="checkbox"/>
262.11(c)(1)	Waste determination is made by testing	yes <input type="checkbox"/>	no <input checked="" type="checkbox"/>	n/a <input type="checkbox"/>
262.11(c)(2)	Waste determination is made by knowledge of process	yes <input checked="" type="checkbox"/>	no <input type="checkbox"/>	n/a <input type="checkbox"/>
MANIFESTS				
262.23(a)-(b)	Generator and transporter signatures and dates are correct	yes <input checked="" type="checkbox"/>	no <input type="checkbox"/>	n/a <input type="checkbox"/>
PRE TRANSPORT				
262.30	Packing – DOT specs.	yes <input type="checkbox"/>	no <input type="checkbox"/>	n/a <input checked="" type="checkbox"/>
262.31	Labeling – DOT specs.	yes <input type="checkbox"/>	no <input type="checkbox"/>	n/a <input checked="" type="checkbox"/>
262.32	Marking – DOT specs.	yes <input type="checkbox"/>	no <input type="checkbox"/>	n/a <input checked="" type="checkbox"/>
262.33	Placarding – DOT specs.	yes <input checked="" type="checkbox"/>	no <input type="checkbox"/>	n/a <input checked="" type="checkbox"/>
262.34(a)(2)	ASD is clearly marked on container and is visible for inspection	yes <input checked="" type="checkbox"/>	no <input type="checkbox"/>	n/a <input type="checkbox"/>
262.34(a)(3)	Containers clearly labeled with the words “Hazardous Waste”	yes <input checked="" type="checkbox"/>	no <input type="checkbox"/>	n/a <input type="checkbox"/>
262.34(d)	Hazardous waste stored on site is within the 180 day limit for an SQG	yes <input checked="" type="checkbox"/>	no <input type="checkbox"/>	n/a <input type="checkbox"/>
262.34(d)(1)	Hazardous waste accumulated is under 13,200 lbs. weight limit for an SQG	yes <input checked="" type="checkbox"/>	no <input type="checkbox"/>	n/a <input type="checkbox"/>
265.171	Containers are in good condition	yes <input checked="" type="checkbox"/>	no <input type="checkbox"/>	n/a <input type="checkbox"/>
265.172	Waste is compatible with containers	yes <input checked="" type="checkbox"/>	no <input type="checkbox"/>	n/a <input type="checkbox"/>
265.173(a)	Containers are closed during storage	yes <input type="checkbox"/>	no <input checked="" type="checkbox"/>	n/a <input type="checkbox"/>
265.173(b)	Containers are closed, handled, and stored as to not cause rupture or leak	yes <input checked="" type="checkbox"/>	no <input type="checkbox"/>	n/a <input type="checkbox"/>
265.174	Containers are inspected at least weekly for leaks, corrosion, etc...	yes <input checked="" type="checkbox"/>	no <input type="checkbox"/>	n/a <input type="checkbox"/>
265.177(a)	Incompatible hazardous wastes are placed in separate containers	yes <input type="checkbox"/>	no <input type="checkbox"/>	n/a <input checked="" type="checkbox"/>
265.177(b)	Incompatible hazardous wastes are placed in washed or new containers	yes <input type="checkbox"/>	no <input type="checkbox"/>	n/a <input checked="" type="checkbox"/>
265.177(c)	Incompatible hazardous waste containers are kept separate during storage	yes <input type="checkbox"/>	no <input type="checkbox"/>	n/a <input checked="" type="checkbox"/>
PREPAREDNESS and PREVENTION				
265.31	Facility is maintained to minimize fire, explosion, & hazardous waste release	yes <input checked="" type="checkbox"/>	no <input type="checkbox"/>	n/a <input type="checkbox"/>
265.32(a)	Facility is equipped with communication or alarm system	yes <input checked="" type="checkbox"/>	no <input type="checkbox"/>	n/a <input type="checkbox"/>
265.32(b)	Facility is equipped with telephone or two way radio to summon emergency response personnel	yes <input checked="" type="checkbox"/>	no <input type="checkbox"/>	n/a <input type="checkbox"/>
265.32(c)	Facility is equipped with fire extinguishers, spill control, decontamination equipment, and eyewashes if liquid waste is present	yes <input checked="" type="checkbox"/>	no <input type="checkbox"/>	n/a <input type="checkbox"/>
265.32(d)	Facility is equipped with water at adequate volume & pressure for sprinkler system	yes <input type="checkbox"/>	no <input checked="" type="checkbox"/>	n/a <input checked="" type="checkbox"/>
265.33	Equipment is tested and maintained as necessary	yes <input checked="" type="checkbox"/>	no <input type="checkbox"/>	n/a <input type="checkbox"/>
265.34(a)	Immediate access to internal communication or alarm is available when handling waste	yes <input checked="" type="checkbox"/>	no <input type="checkbox"/>	n/a <input type="checkbox"/>
265.34(b)	Immediate access to telephone or two way radio is available when only one employee is handling waste	yes <input checked="" type="checkbox"/>	no <input type="checkbox"/>	n/a <input type="checkbox"/>
265.35	Proper aisle space for the unobstructed movement of personnel and emergency equipment is provided in case of an emergency	yes <input checked="" type="checkbox"/>	no <input type="checkbox"/>	n/a <input type="checkbox"/>
265.37(a)(1)-(4)	Facility has attempted to make arrangements with local authorities, as appropriate	yes <input checked="" type="checkbox"/>	no <input type="checkbox"/>	n/a <input type="checkbox"/>
265.37(b)	Facility has provided document refusal or agreement arrangement	yes <input checked="" type="checkbox"/>	no <input type="checkbox"/>	n/a <input type="checkbox"/>
268.7(a)(5)	(If treating waste to meet LDR standards) Facility has waste analysis plan on-site and is following it accordingly	yes <input type="checkbox"/>	no <input type="checkbox"/>	n/a <input checked="" type="checkbox"/>
268.7(a)(5)(i)	Facility's WAP has detailed chemical and physical analysis of waste	yes <input type="checkbox"/>	no <input type="checkbox"/>	n/a <input checked="" type="checkbox"/>
268.7(a)(5)(ii)	Facility's WAP is available to inspectors	yes <input type="checkbox"/>	no <input type="checkbox"/>	n/a <input checked="" type="checkbox"/>
268.7(a)(5)(iii)	Waste shipped off site complies with LDR notices	yes <input type="checkbox"/>	no <input type="checkbox"/>	n/a <input checked="" type="checkbox"/>

SMALL QUANTITY GENERATOR CHECKLIST

Citation	PREPAREDNESS and PREVENTION (cont.)	SQG
262.34(d)(5)(i)	Designated ER coordinator is on the premises or on call and able to respond to an emergency by reaching the facility promptly	yes <input checked="" type="checkbox"/> no <input type="checkbox"/> n/a <input type="checkbox"/>
262.34(d)(5)(ii)(A)	Name and telephone # of ER coordinator are posted by the phone (all phones recommended)	yes <input checked="" type="checkbox"/> no <input checked="" type="checkbox"/> n/a <input type="checkbox"/>
262.34(d)(5)(ii)(B)	Locations of extinguishers, spill equipment, and alarms are posted by the phone (all phones recommended)	yes <input type="checkbox"/> no <input checked="" type="checkbox"/> n/a <input type="checkbox"/>
262.34(d)(5)(ii)(C)	Telephone # of fire department is posted by the phone unless the facility has a direct alarm (all phones recommended)	yes <input type="checkbox"/> no <input checked="" type="checkbox"/> n/a <input type="checkbox"/>
262.34(d)(5)(iii)	Facility has provided training to employees on proper waste handling & emergency procedures relevant to responsibilities	yes <input checked="" type="checkbox"/> no <input type="checkbox"/> n/a <input type="checkbox"/>
262.34(d)(5)(iv)(A) thru (C)	Emergency coordinator responds to FIRES, SPILLS, EXPLOSIONS, and RELEASES & calls the National Response Center with proper information	yes <input type="checkbox"/> no <input type="checkbox"/> n/a <input checked="" type="checkbox"/>
262.34 (e)	If transporting further than 200 miles, hazardous waste stored on site is within the 270 day limit for an SQG	yes <input type="checkbox"/> no <input type="checkbox"/> n/a <input checked="" type="checkbox"/>
RECORD KEEPING and REPORTING		
262.44(a)	Signed manifests are kept for 3 years from the date the waste was picked up	yes <input checked="" type="checkbox"/> no <input type="checkbox"/> n/a <input type="checkbox"/>
262.44(a)	Test results are retained for three years from date the waste was sent to TSD	yes <input type="checkbox"/> no <input type="checkbox"/> n/a <input checked="" type="checkbox"/>
262.44(b)	Exception reports are filed with EPA Regional Administrator for any copy of manifests not received within 60 days of pickup with a handwritten signature of TSD	yes <input type="checkbox"/> no <input type="checkbox"/> n/a <input checked="" type="checkbox"/>
LIST HAZARDOUS WASTE TRANSPORTERS USED FOR PICK UP		
1)	ACT	
2)	Veolia	
3)		
LIST HAZARDOUS WASTE FINAL DESTINATION FACILITIES (TSDF)		
1)	Veolia	
2)		
3)		
ER / EH&S COORDINATOR: Rip Winckel		
MONTHLY AVG. HAZ WASTE GENERATED: ~500 LBS.		
COMMENTS:		
Frequent, periodic SQG due to change-outs of the oxalate bath solution		