



SUSANA MARTINEZ  
Governor

JOHN A. SANCHEZ  
Lieutenant Governor

**NEW MEXICO  
ENVIRONMENT DEPARTMENT**

2905 Rodeo Park Drive East, Building 1  
Santa Fe, New Mexico 87505-6303  
Phone (505) 476-6000 Fax (505) 476-6030

[www.env.nm.gov](http://www.env.nm.gov)



BUTCH TONGATE  
Cabinet Secretary

J.C. BORREGO  
Acting Deputy Secretary

**CERTIFIED MAIL – RETURN RECEIPT REQUESTED**

September 19, 2016

Rip Winckel  
EHS Manager  
Goodrich ISR Systems  
6600 Gulton Court NE  
Albuquerque, NM 87109

**RE: NOTICE OF VIOLATION AND RESOLUTION  
GOODRICH ISR SYSTEMS  
EPA ID# NMD035686823**

Dear Mr. Winckel:

On August 15, 2016, the New Mexico Environment Department (NMED) conducted a hazardous waste Compliance Evaluation Inspection at Goodrich ISR Systems located at 6600 Gulton Court NE, Albuquerque, New Mexico. Based on the inspection and a review of the information obtained, the NMED has determined that your facility is a Small Quantity Generator of hazardous waste as defined in the Notification of Regulated Waste Activity Instructions (EPA Form 8700-12), and has violated the Hazardous Waste Management Regulations (20.4.1 NMAC) as specified below.

Goodrich ISR Systems is a manufacturer of space vehicle data acquisition electronics. The facility generates hazardous wastes including spent solvents, contaminated wipes/rags and solder dross. The facility also generates mercury-containing electronic waste, which is managed as Universal Waste.

NMED inspectors observed the following violations:

1. Failure to keep containers of hazardous waste closed, except when adding or removing waste. Specifically, NMED inspectors observed a cubic yard box of

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hazardous waste solids at the central accumulation area that was not properly closed at the time of inspection. This is a violation of 20.4.1.300 NMAC, incorporating 40 CFR § 262.34(d)(2), referring to 40 CFR § 265.173(a).

2. Failure to post emergency response information next to a phone. Specifically, NMED inspectors observed that the required emergency information postings (name and phone number of the emergency coordinator(s), phone number of the fire department, and locations of emergency equipment) were not posted next to a facility phone at the time of inspection. This is a violation of 20.4.1.300 NMAC, incorporating 40 CFR § 262.34(d)(5)(ii).

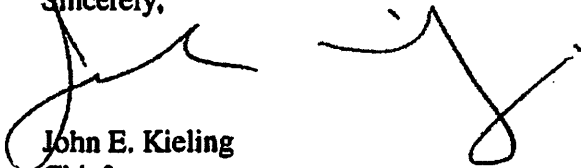
NMED has determined that the violations were adequately addressed during the Compliance Evaluation Inspection. No further action is required.

This facility is in the process of closure, and is expected to begin decommissioning activities in November 2016. During this time, the facility may become a Large Quantity Generator of hazardous waste. NMED encourages Goodrich ISR Systems, and its contracted remediation consultant, to coordinate with NMED regarding hazardous waste regulatory compliance and responsible handling and disposal of hazardous wastes during this process.

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

If you have any questions regarding this letter, please contact Aaron Coffman of my staff at (505) 476-6019 or by email at [aaron.coffman@state.nm.us](mailto:aaron.coffman@state.nm.us).

Sincerely,



John E. Kieling  
Chief  
Hazardous Waste Bureau

JEK: ac

cc: Janine Kraemer, NMED HWB  
Aaron Coffman, NMED HWB  
William Chavez, NMED District I Manager

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