



NEW MEXICO ENVIRONMENT DEPARTMENT



Hazardous Waste Bureau

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HAZARDOUS WASTE COMPLIANCE EVALUATION REPORT

Evaluation Type: CEI [checked] CAV [] Other []

Facility: IFC Electronics Location: 1450 Mission Ave NE
EPA ID #: NMR000003640 Albuquerque, NM 87107
Ownership: Same Mailing Address: Same

Facility Representative/Contact: Karl D Houston Title: Facilities Manager
Date: 5/7/15 Time of Entry: 8:45 Am

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

Participants: Print:
Table with columns: Name, Title, Phone#
Rows: Don Meyer (Env. Specialist, 505-476-6021), Aaron Coffman (Env. Specialist, 505-222-9503), Karl D Houston (Facilities Manager, 505-554-7963)

EPA ID NMR000003640
Facility Name IEC Electronics
Date 5/7/15

This Compliance Evaluation was conducted based on:

Reason for Inspection: Routine Complaint Follow-up Never Been Inspected
Facility was Last Inspected on: 10/6/09
Facility is: Notifier Non-Notifier

History, Size, and Nature of Business:

The facility has been in business at this location since 1999. IEC does contract electronic manufacturing and assembles circuit boards, chassis and chassis harnesses for defense, aerospace and electronics companies. Building is 72,000 sf, property is 6 acres and employs 100 people. Normal business hours are 7:30 am to 4:30 pm with most employees taking off on alternate Fridays.

Waste Processes Forms
Potential Violation(s) Forms
Checklists Completed: CESQG SQG <90 Day Used Oil Other:

Current Status: CESQG SQG LQG TSD Complaint Response
Transporter Recycler Non-Handler Other:

Results of Inspection:

Conducted a walkthru of the entire facility including the chemical storage area, 180-day storage area and the production area. Reviewed hazardous waste manifests, 180 day area inspection logs, training records and letters to authorities for past three years. Potential violations were observed for incomplete letters to authorities, incorrect management of universal waste lamps and failure to keep an SAA closed. The lamps were corrected at the time of the closeout meeting. Fees for 2014 were paid under GTC's name in the fee database.

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Process Information

Waste Type & Code	Process, Location/How Managed Transporter & Destination	Est. Quantity per Month
D001, D035, F002, F003 and F005	Circuit board and other electronic devices are washed in an IPA solution, which is staged in waste containers (SAAs) and moved to a 180-day storage area which is located in the Chemical Storage Area. Waste solvent is primarily D001 and F003 and is picked up and disposed of by ACT.	100 gal
D008	Cleaning wipes potentially have lead contamination from soldering work done on the circuit boards. Wipes are taken to the 180 day storage area at the end of each shift and placed in a 1-cf yard box.	200 lbs
D002	DTRL is a independent testing company located on IEC's property and their waste is disposed of through IEC's ID #. DTRL uses corrosives to clean and etch products to be tested. Waste is staged in 180 area and sent off with ACT.	5 gal
D008	Universal waste lamps are purchased and disposed of through Grainger. Lamps are stored in a box which is mailed back to Grainger when full.	2 lamps
Scrap metal	Recyclable scrap metals are sent to FCT in CO.	10 lbs

POTENTIAL VIOLATIONS LIST

IEC Electronics
EPA ID# NMR000003640
1450 Mission Ave. NE
Albuquerque, NM 87107

Inspection Start Date: May 7, 2015.

Lead Inspector: Don Meyer.

Failure to label an SAA with the words Hazardous Waste or label as a daily use container. Two one-gallon waste IPA containers were found without labels in the Hand Cleaning Room. This is a violation of 262.34(a)(3).

Failure to keep a satellite accumulation area (SAA) closed when not filling or emptying. There were two 1-gallon waste IPA containers located in the Hand Cleaning Room that were covered with mesh tops. Mesh tops are not spill proof or vapor tight which is part of the EPA's definition of a closed container. This is a violation of 262.34(d) referring to 265.173(a).

Failure to dispose of hazardous waste within 180 days of the start of accumulation. One glass quart jar labeled Epoxy and dated 6/17/14 and one 1-gallon metal container labeled Arathane and dated 6/16/14 were found in the 180 day storage area which is in the Chemical Storage Room. This is a violation of 40 CFR 262.34(d).

Failure to make arrangements with the local authorities. IEC contacted the Albuquerque Fire Dept., but did not contact the police or a local hospital with the layout of the facility; properties of the hazardous wastes handled at the facility and associated hazards. This is a violation of 40 CFR 262.34(d)(4) referring to 40 CFR 265.37(a)(1-4).

Failure to properly contain one box of 4-ft fluorescent lamps. The box was located in the warehouse. Spent lamps must be placed in containers that prevent breakage and release to the environment. This is a violation of 40 CFR 273.13(d)(1). Corrected on 5/8/15.

Failure to label one container of spent lamps Universal Waste, located in the warehouse. This is a violation of 40 CFR 273.14(e). Corrected on 5/8/15.

Failure to mark the lamps mentioned above with an accumulation start date is a violation of 40 CFR 273.15(c)(2). Corrected on 5/8/15.

