



**NEW MEXICO
ENVIRONMENT DEPARTMENT**



SUSANA MARTINEZ
Governor
JOHN A. SANCHEZ
Lieutenant Governor

2905 Rodeo Park Drive East Building 1
Santa Fe, NM 87505-6303
Phone (505) 476-6000 Fax (505) 476-6030
www.nmenv.state.nm.us

RYAN FLYNN
Cabinet Secretary
BUTCH TONGATE
Deputy Secretary

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

June 4, 2015

Karl Houston
Facilities Manager
IEC Electronics
1450 Mission Ave. NE
Albuquerque, NM 87107

**RE: NOTICE OF VIOLATION AND RESOLUTION
IEC ELECTRONICS
EPA ID# NMR000003640**

Dear Mr. Houston:

On May 7, 2015, the New Mexico Environment Department (NMED) conducted a hazardous waste Compliance Evaluation Inspection at IEC Electronics (IEC), located at 1450 Mission Rd. NE, Albuquerque. Based on that inspection and review of the information obtained, 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 New Mexico Hazardous Waste Management Regulations (20.4.1 NMAC) as specified below.

NMED observed the following violations:

1. Failure to label a satellite accumulation area (SAA) container with the words Hazardous Waste. NMED inspectors observed two one-gallon waste isopropyl alcohol (IPA) containers in the Hand Cleaning Room without labels. This is a violation of 20.4.1.300 NMAC, incorporating 40 CFR § 262.34(a)(3).
2. Failure to keep an SAA container closed when not filling or emptying. NMED observed two 1-gallon waste IPA containers in the Hand Cleaning Room that were open with mesh tops. Mesh tops are neither spill proof nor vapor tight. This is a violation of 20.4.1.300 NMAC, incorporating 40 CFR § 262.34(d) referring to 265.173(a).
3. Failure to dispose of hazardous waste within 180 days of the start of accumulation. NMED inspectors observed one glass 1-quart jar labeled "Epoxy" and dated 6/17/14, and

one 1-gallon metal container labeled Arathane and dated 6/16/14. The containers were found in the 180 day storage area in the Chemical Storage Room. This is a violation of 20.4.1.300 NMAC, incorporating 40 CFR § 40 CFR 262.34(d).

4. Failure to make arrangements to familiarize local police, fire departments, emergency response teams and local hospitals of the hazards associated with the facility. IEC personnel could not demonstrate that the facility had notified the local authorities. This is a violation of 20.4.1.300 NMAC, incorporating 40 CFR § 262.34(d)(2) referring to 40 CFR § 265.37(a)(1-4).
5. Failure to properly contain universal waste lamps. NMED inspectors observed one open box of spent 4-ft fluorescent lamps in the warehouse. This is a violation of 20.4.1.1000 NMAC, incorporating 40 CFR § 273.13(d)(1).
6. Failure to label one container of spent lamps with the words Universal Waste or similar wording. NMED inspectors observed one box of unlabeled spent 4-ft lamps in the warehouse. This is a violation of 20.4.1.1000 NMAC, incorporating 40 CFR § 273.14(e).
7. Failure to demonstrate the length of time universal waste, *i.e.*, fluorescent light bulbs, has been accumulating on site. IEC personnel could not demonstrate the amount of time the spent fluorescent bulbs had been accumulating on site. This is a violation of 20.4.1.1000 and 1001 NMAC, referencing 40 CFR § 273.15(c).

NMED inspectors observed that violations numbered 5, 6 and 7 were corrected during the inspection. Violations numbered 1, 2, 3 and 4 were demonstrated to have been adequately corrected in your May 21, 2015, response. There, no further action is required in relation to the above identified violations.

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 your facility 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 IEC of its obligation to comply with any other applicable laws and regulations.

Karl Houston
June 4, 2015
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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,



John E. Kieling
Chief
Hazardous Waste Bureau

JEK:dm

cc: Steve Pullen, NMED HWB
Janine Kraemer, NMED HWB
Don Meyer, NMED HWB
William Chavez, NMED District I Manager

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