

INSPECTION DOCUMENTATION FILE CHECKLIST

Facility: **Senheiser LLC**

Facility Library File #: **2728**

Lead Inspector: **Jaime Rodriguez**

Inspection Type: **CAV** Date: **8/11/2011**

Document Type	Comments	Completion Date	Final in File
Inspection Report	Compliance Assistance Visit	8/11/2011	8/18/2011
Photo Sheets	6 sheets/13Photos	9/14/2011	9/14/2011
Violation/ Field Worksheet		----	----
Checklists	CESQG	8/11/2011	8/19/2011
Supporting Documentation		----	----
Response Documentation		----	----
Miscellaneous Correspondence/ Other		----	----
Field Notes		----	----
Complaint Form		----	----

TA In-Compliance Letter	Mailed September 22, 2011	9/14/2011	9/22/2011
CEI In-Compliance Letter		----	----
NOV Letter		----	----
RTC Letter		----	----
NOV/RTC Letter		----	----
Compliance Order		----	----
Stipulated Final Order		----	----

Completeness Review

Reviewer: 

Date: 10/25/11

Library Submittal

Filed By: Uomozzo Pinos

Date: 10.27.11



SUSANA MARTINEZ
Governor

JOHN A. SANCHEZ
Lieutenant Governor

**NEW MEXICO
ENVIRONMENT DEPARTMENT**

Hazardous Waste Bureau

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



DAVE MARTIN
Secretary

BUTCH TONGATE
Acting Deputy Secretary

September 22, 2011

Greg Rust
Quality Engineer
Sennheiser LLC.
5321 Wilshire NE
Albuquerque, NM 87113

**SUBJECT: HAZARDOUS WASTE CONSULTATION REPORT
SENNHEISER LLC., EPA ID# NMR000004952**

Dear Mr. Rust:

On August 11, 2011, the New Mexico Environment Department (NMED) provided Sennheiser LLC., located at 5321 Wilshire NE, Albuquerque, a Compliance Assistance Visit to address potential hazardous waste issues and pollution prevention options. Based on observations and a review of the information obtained, the NMED has determined that your facility is a Conditionally Exempt Small Quantity Generator of hazardous waste.

Sennheiser LLC. generates very small amounts of isopropyl alcohol and there were no areas of concern at this time.

The NMED appreciates your efforts to adhere to the Hazardous Waste Management Regulations (20.4.1 NMAC).

Greg Rust
September 22, 2011
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If you have any questions, please contact me by phone at (505) 476-6067 or by mail at the address on the letterhead.

Sincerely,



Jaime Rodriguez
Environmental Specialist
Compliance and Technical Assistance Program

cc: Program Manager Reading File, NMED HWB
Brady Christensen, NMED HWB
William Chavez, NMED District I

file: Library # 2728



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ENVIRONMENT DEPARTMENT



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Hazardous Waste Consultation Report

I have read the explanation of the on-site technical assistance program and agree to participate in the program. I also agree to correct any and all violations of the Hazardous Waste Regulations (20.4.1 NMAC) identified by the Hazardous Waste Bureau (HWB), within the time period(s) agreed for each violation. I also understand that further enforcement may take place if the corrections are not made. I also certify that I am a responsible party (owner or manager) to the facility listed below.

Facility Representative GREG RUST Title QUALITY ENGINEER Date 8/11/2011

Facility Name: Senn heiser LLC EPA #: NM R000004952

Facility Contact(s): Gregory Rust

Title(s): ISO Manager / Quality Engineer

Phone: (505) 798-2400 Fax: _____

Address: 5321 Wilshire NE

Mailing Address: same as above

City: Albuquerque Co: Bernalillo Zip: 87113

Notification Status (circle): CESQG SQG LQG TSD Complaint Response
 Transporter Recycler Non-Handler Other

NMED/HWB Lead Inspector: Jaime Rodriguez

Other Representatives: Michael Duran

Time On Site: 1:10 AM/PM Time Off Site: 3:45 AM/PM

Facility History & Nature of Business: Sennheiser llc. has been in business since 2000. They have approximately 150 employees in a 45,416 square foot building that sits on 105,625 square feet of land. They run 24 hr shifts 5 days a week and are in the business of producing electronic components for the music industry.

EPA ID NM8000004952
Facility Name Sennheiser
Date 8-11-11

The Following Potential Violations Were Noted:

Potential Violation	Specifics: (location, quantities, documents, photos, etc.)	Regulatory Citation
<p>* No conditions out of compliance</p>		

CONDITIONALLY EXEMPT SMALL QUANTITY GENERATOR CHECKLIST

FACILITY: Sennheiser LLC

DATE: 8-11-11

EPA ID#: NMNR 000204952

INSPECTOR: JRC

CITATION	GENERAL	CESQG
261.5(g)(1)	Facility has made a determination for all hazardous waste generated	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 type="checkbox"/> n/a <input checked="" 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"/>
261.5(g)(2)	Hazardous waste stored is within the 2,200 lbs. weight limit for a CESQG	yes <input checked="" type="checkbox"/> no <input type="checkbox"/> n/a <input type="checkbox"/>

LIST ALL HAZARDOUS WASTE GENERATED AND MONTHLY AMOUNTS

1) <u>Isopropyl Alcohol</u>	amount - <u>24 ounces</u>	4)	amount -
2)	amount -	5)	amount -
3)	amount -	6)	amount -

MONTHLY AVG. HAZ WASTE GENERATED: 2 / LBS.

261.5(a)	Facility generates less than 220 lbs. of hazardous waste per month	yes <input checked="" type="checkbox"/> no <input type="checkbox"/> n/a <input type="checkbox"/>
261.5(g)(3)	Hazardous waste is disposed of in a proper manner	yes <input checked="" type="checkbox"/> no <input type="checkbox"/> n/a <input type="checkbox"/>

LIST HAZARDOUS WASTE TRANSPORTERS USED FOR PICK UP (if any)

1) <u>Kinchem</u>	3)
2)	4)

CHECK ANY NON-HAZARDOUS WASTE GENERATED

Used Oil Used Oil Filters Oily Rags Spent Antifreeze Used Tires Scrap Metal

BEST MANAGEMENT PRACTICES

Facility keeps records or signed manifests of any hazardous waste picked up	yes <input checked="" type="checkbox"/> no <input type="checkbox"/> n/a <input type="checkbox"/>
Containers clearly labeled with the words "Hazardous Waste" or its contents	yes <input checked="" type="checkbox"/> no <input type="checkbox"/> n/a <input type="checkbox"/>
Containers are in good condition	yes <input checked="" type="checkbox"/> no <input type="checkbox"/> n/a <input type="checkbox"/>
Waste is compatible with containers	yes <input checked="" type="checkbox"/> no <input type="checkbox"/> n/a <input type="checkbox"/>
Containers are closed during storage	yes <input checked="" type="checkbox"/> no <input type="checkbox"/> n/a <input type="checkbox"/>
Hazardous waste storage area is clear and free of clutter	yes <input checked="" type="checkbox"/> no <input type="checkbox"/> n/a <input type="checkbox"/>
Facility has provided training to employees on proper waste handling	yes <input checked="" type="checkbox"/> no <input type="checkbox"/> n/a <input type="checkbox"/>
Facility is equipped with spill control and or decontamination equipment	yes <input checked="" type="checkbox"/> no <input type="checkbox"/> n/a <input type="checkbox"/>
Facility is equipped with an eye wash in case of emergency's	yes <input checked="" type="checkbox"/> no <input type="checkbox"/> n/a <input type="checkbox"/>
Spills or releases are cleaned up immediately	yes <input checked="" type="checkbox"/> no <input type="checkbox"/> n/a <input type="checkbox"/>
Fluorescent light bulbs are recycled instead of thrown in trash	yes <input checked="" type="checkbox"/> no <input type="checkbox"/> n/a <input type="checkbox"/>

COMMENTS:

USED OIL CHECKLIST

FACILITY: Sennheiser

DATE: 8-11-11

EPA ID#: NMWR000004952

INSPECTOR: ML

CITATION	STORAGE	USED OIL
279.10(b)(1)(i)	Hazardous waste that is mixed with used oil contains < 1000 ppm total halogens	yes <input type="checkbox"/> no <input type="checkbox"/> n/a <input type="checkbox"/>
279.22(a)	Used oil is stored in proper tanks or containers	yes <input type="checkbox"/> no <input type="checkbox"/> n/a <input type="checkbox"/>
279.22(b)(1), (2)	Used oil containers / above ground tanks are in good condition with no leaks	yes <input type="checkbox"/> no <input type="checkbox"/> n/a <input type="checkbox"/>
279.22(c)(1) and 20.4.1.1003A NMAC	Used oil containers / above ground tanks are labeled with the words "Used Oil" or other words that identify its contents	yes <input type="checkbox"/> no <input type="checkbox"/> n/a <input type="checkbox"/>
279.22(c)(2)	Fill pipes transferring used oil to underground tanks are labeled "Used Oil"	yes <input type="checkbox"/> no <input type="checkbox"/> n/a <input type="checkbox"/>
279.22(d)(1), (2), and (3)	Upon detection of a release of used oil to the environment, the generator has stopped, contained, cleaned up, and managed it properly	yes <input type="checkbox"/> no <input type="checkbox"/> n/a <input type="checkbox"/>
20.4.1.1003B(1) NMAC	Containers kept outdoors are closed unless adding or removing oil	yes <input type="checkbox"/> no <input type="checkbox"/> n/a <input type="checkbox"/>
ON-SITE BURNING		
	Generator uses an on-site used oil space heater	yes <input type="checkbox"/> no <input type="checkbox"/>
279.23(a)	Heater burns only used oil generated on site or received from do-it-yourself generators	yes <input type="checkbox"/> no <input type="checkbox"/> n/a <input type="checkbox"/>
279.23(b)	Heater has a designed maximum capacity of 0.5 million Btu's per hour or less	yes <input type="checkbox"/> no <input type="checkbox"/> n/a <input type="checkbox"/>
279.23(c)	The combustion gasses from the heater are vented to the ambient air	yes <input type="checkbox"/> no <input type="checkbox"/> n/a <input type="checkbox"/>
OFF-SITE SHIPMENTS		
279.24	Used oil is only transported by transporter who has an EPA ID #	yes <input type="checkbox"/> no <input type="checkbox"/> n/a <input type="checkbox"/>
279.24(a)(1)	If self-transporting, vehicle is owned by generator or employee of generator	yes <input type="checkbox"/> no <input type="checkbox"/> n/a <input type="checkbox"/>
279.24(a)(2)	If self-transporting, no more than 55 gallons are transported at any time	yes <input type="checkbox"/> no <input type="checkbox"/> n/a <input type="checkbox"/>
279.24(a)(3)	If self-transporting, the used oil is sent to collection center that is registered, licensed, permitted, or recognized by government to manage used oil	yes <input type="checkbox"/> no <input type="checkbox"/> n/a <input type="checkbox"/>
LIST USED OIL TRANSPORTERS USED FOR PICK UP		
1)		
2)		
3)		
MONTHLY AVG. USED OIL GENERATED: GALLONS		
COMMENTS:		

HWB PHOTO SHEET



Facility: Sennheirser LLC.

Photo #: 1

Date/Time: 8/11/11

Location: Waste collection area.

Description: 55-gallon drum where isopropyl alcohol is collected.

Violation(s): NONE



Facility: Sennheirser LLC.

Photo #: 2

Date/Time: 8/11/11

Location: Waste collection area.

Description: Circuit board cuttings and rejected circuit boards collected for recycling.

Violation(s): NONE

HWB PHOTO SHEET



Facility: Sennheirser LLC.

Photo #: 3

Date/Time: 8/11/11

Location: Waste collections area.

Description: 4 foot spent fluorescent bulbs.

Violation(s): NONE

Facility:

Photo #:

Date/Time:

Location:

Description:

Violation(s):