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Utah Department of Environmental Quality
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1-800-458-0145

Annual Report

For the period of January 1, 2011 through December 31, 2011

IM Flash Technologies, LLC

Facility Name

1550 East 3400 North
Facility Street Address

Lehi
City

84043
Zip

Project Status

On a separate sheet, summarize:

- your Clean Utah project commitments and accomplishments made to date,
- major indicators of environmental improvements (measurable ways that you are determining the environment is improving as the result of steps you are taking),
- public participation activities you have undertaken, and
- your project plans for next year, as they relate to this program.

Certification Statement

(to be signed by the senior facility manager)

I certify that to the best of my knowledge the information outlined in the attached annual report is correct and that this facility continues to meet all program criteria and has an active EMS, as defined by the Clean Utah program. I further certify that this facility has conducted periodic assessments of compliance with legal requirements, has corrected all identified instances of noncompliance, and is currently in material compliance with all applicable federal, state, and local environmental rules and regulations.

Signed

February 6, 2012

Date

Brad Mortensen
Print Name

Facilities Manager
Title

Environmental Improvement Project #1: Hazardous Waste Reduction

Target: Decrease hazardous waste generation by 20% over a two-year period.

Project Begin: July 1, 2010

Project End: June 30, 2012

Project Overview and Accomplishments: IM Flash Technologies, LLC (IMFT) generates hazardous waste during the semiconductor manufacturing process. IMFT is committed to waste minimization and therefore, continuously strives to identify opportunities to reduce, reuse, or recycle chemicals used in the manufacturing process. A 20% reduction in hazardous waste generation over a two-year period was established as the target. The baseline period for this the reduction target is the year prior to the beginning of the project. Efforts to reduce hazardous waste have demonstrated to be economically beneficial to IMFT. Strategies to meet this target and the current status of the project are summarized in the following table.

Strategy	Description	Status
1	Install a more efficient waste collection system for arsenic waste	New arsenic waste collection system was installed. Waste stream was reduced by approximately 85%.
2	Segregate waste streams	Solvent waste streams were segregated using dedicated drain systems to increase waste solvent purity and ensure a desirable product.
3	Identify potential outlets that may reuse waste streams as useful products	Beginning 2012, an outlet was identified for one of the bulk solvent waste streams. This waste will now be recycled through reuse.

Indicators to demonstrate progress toward achieving this goal include: 1) mass of hazardous waste generated; and 2) Productivity Index (PI) based on manufactured product for the respective timeframe.

Progress: IMFT achieved a 10% reduction in the mass of hazardous waste generated in the first 12 months. The waste reduction was adjusted to 7% when normalized with the PI. Efforts to reduce hazardous waste continue. Beginning January 2012, IMFT eliminated a bulk solvent waste stream from the designation as hazardous waste by identifying an entity that can use the solvent as a product. This effort will significantly reduce hazardous waste generation going forward. The final results of this project will be summarized in the 2012 annual report.

Benefits: The reduction in hazardous waste generation decreases the mass of hazardous waste treated at off-site treatment, storage and disposal facilities. This project also leads to a reduction in waste handling and disposal costs.

Environmental Improvement Project #2: Reduce Office Paper Use by 20%

Target: Decrease amount of paper purchased by 20% from 2010 levels.

Project Overview and Accomplishments: IM Flash Technologies, LLC (IMFT) believed that environmental awareness of its employees could be increased through the implementation of a project that impacted the entire site. The duplex property default setting on most printers/copiers was set to double-sided printing. Environmental awareness of this project has been communicated site-wide through various methods.

Strategy	Description	Status
1	Setting office printers to default double-sided printing	Default double-sided printing was initiated March 1, 2011. Printing activity was tracked using the copier vendor's data collection system. The rate of duplex printing increased from 14% to 55%.
2	Educating employees about paper reduction and encouraging use of digital media	Communication regarding this environmental improvement project was communicated to employees through newsletters, Intranet articles, meetings, and ESH monthly indicators. During the annual environmental management system (EMS) audit it was evident that employees recognized paper use reduction as an objective of the EMS
3	Identify other paper reduction or recycled paper opportunities to implement if feasible	IMFT recycles office paper. Recycle bins are located throughout the office areas. Meeting rooms are equipped with overhead projectors. Employees are encouraged to use electronic methods of communication.

Progress: Completed

Benefits: IMFT is committed to conserving natural resources. During calendar year 2011, there was an 11% decrease in office paper purchases relative to 2010. Although the 20% reduction in paper purchases was not achieved, IMFT considers this project a success because it will have a sustaining impact. The reduction in paper purchases represents a cost savings to IMFT.

Environmental Improvement Project #3 (Proposed for calendar year 2012): Modify the waste water treatment system to improve copper removal and generate a useful product.

Target: Install and operate a copper reclaim system in a waste water stream.

Project Overview: IM Flash Technologies, LLC (IMFT) generates waste water from the semiconductor manufacturing process. Currently, waste water containing residual copper is treated using ion-exchange technology. IMFT is proposing to install a copper plating system to remove copper from the waste water and generate a useful product that may be recycled. When this project is approved by DEQ, IMFT will make this project information available to the public by posting it on the IMFT website.

Benefits: This project will significantly reduce or eliminate an ion-exchange resin hazardous waste stream that is accumulated for off-site disposal. The proposed copper reclaim system will generate copper metal that may be recycled. This project is consistent with IMFT's commitment to conserve natural resources and minimize waste.

Following the initial capital investment, IMFT expects that there will be a cost savings to the company. This project has the potential to eliminate or reduce two hazardous waste streams and the expense associated with current treatment and disposal.