



PHILIPS

Philips Components

Signetics Company

a division of North American Philips Corporation

9201 Pan Am Fwy.

P.O. Box 10272

Albuquerque, New Mexico 87184

Telephone 505/822-7000

September 21, 1990

Elizabeth Gordon, Ph.D.
Permitting Supervisor
Hazardous Waste Program
Environmental Improvement Division
1190 St. Francis Dr.
Santa Fe, NM 87503



Dear Ms. Gordon:

Signetics Company in Albuquerque, New Mexico is a semiconductor manufacturing facility with a RCRA Part B Permit for the storage of hazardous waste. Signetics is permitted for F002, F003, D001, D002, D004, and D009 wastes.

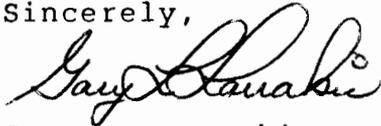
With Signetics intent to comply with the new TCLP regulation, we sampled our major waste streams and send them to an EPA approved private laboratory for analysis using the new leaching procedure to test for the new organics added by TCLP. The test results showed carbon tetrachloride and tetrachloroethylene above the regulatory level in one of our existing waste streams.

Both carbon tetrachloride and tetrachloroethylene are listed wastes under the F-codes but the TCLP rule now assigns a specific D-code to each. In our attempt to comply with the intent of the rule, we requested guidance on whether we needed to modify our permit to include the new D-codes from the State and Regional authorities as well as the RCRA Hotline.

Mr. Richard Mayer with EPA Region 6, The RCRA Hotline, and yourself were all in agreement that we were covered for these organics under the F-codes in our existing permit and did not need to modify our permit. You also informed us that the State of New Mexico would not have the authority to enforce the new regulation until it was adopted to the State regulations. Since

the F001-F005 wastes are already subjected to land disposal restrictions, the new D-codes will not change how the waste is handled. Given these arguments, Signetics will follow the guidance of our State and Regional authorities and not modify our permit at this time.

Sincerely,

A handwritten signature in cursive script, appearing to read "Gary M. Mavrakis".

Gary M. Mavrakis
Site Materiel Manager

cc: Mr. Richard Mayer, EPA, Region 6