

MEMORANDUM

ENTERED

TO: Stephanie Kruse, RCRA Permitting Program

FROM: Teri Davis, RCRA Technical Compliance Program

THROUGH: Ronald A. Kern, Technical Compliance Program Manager

DATE: October 2, 1995

SUBJECT: **Technical Review on Phillips Semiconductors RCRA Closure Plan, dated September 1995, for Hazardous Waste Storage Areas, Albuquerque, New Mexico.**

The following are technical comments on Phillips Semiconductors RCRA Closure Plan, dated September 1995, for hazardous waste storage areas in Albuquerque, New Mexico, as requested by the RCRA Permitting Program, October 2, 1995. The issues of concern raised by Permitting staff focused on two specific sampling questions. One question centered on the use of the Toxicity and Characteristic Leaching Procedure (TCLP) for a determination of equivalency with closure performance standards. The other question was with regards to the adequacy of the sampling and analysis plan presented for soils beneath the units.

This closure plan involves four hazardous waste storage areas which have no reported spills of RCRA hazardous waste (pg.1, section I.1.a). According to the closure plan, wastes are stored in tanks situated within coated concrete vaults which provide primary and secondary containment. The above general observations indicate that the verification sampling for this closure plan should not be extensive.

**TCLP Issue**

The closure performance standard for Chemical Storage #2 is stated on page 5 as being the Maximum Contaminant Level (MCL) for mercury and arsenic. TCLP is mentioned in this section but only with reference to analyzing the residual material in Chemical Storage #2. The closure performance standards listed on page 2 appear adequate for this area.

**Sampling and Analysis Plan**

As stated on pg.1, section (I.1.a); "soil samples will be collected to confirm the indication that there has not been a release from the storage areas". This plan does not provide enough information to determine the adequacy of the proposed verification sampling. It is unknown where, how, and what will be sampling and analyzed.

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A soil verification sampling and analysis plan should be submitted for approval which contains at a minimum:

- 1) A map showing the proposed sampling locations relative to the storage areas;
- 2) A brief summary of the proposed sampling procedures (including sampling depths, sampling equipment, etc.); and
- 3) A listing of what parameters will be analyzed for and what EPA SW-846 test methods or equivalent methods will be utilized for verification of clean closure for the hazardous constituents contained in the wastes stored at each hazardous waste storage area. A quality assurance and quality control data package should be submitted with the analytical results and should be mentioned in the sampling and analysis plan as a deliverable.

cc: Red File  
Barbara Hodontschek