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October 10, 1995

Mr. James Cochran
EHS Manager
Philips Semiconductors
9201 North American Freeway NE
Albuquerque, New Mexico 87113

Dear Mr. Cochran:

As we discussed at our meeting of October 4, 1995, enclosed please find this Bureau's comments on your revised closure plan. These comments address the items which should be contained in a soil verification sampling and analysis plan adequate for closure of the storage units at your facility.

Please call Stephanie Kruse of my staff at 827-1561 if you have any questions or comments.

Sincerely,

for Robert A. D'Amico
Barbara Hoditschek, Manager
RCRA Permits Program

xc: Teri Davis, NMED
Melanie McKinley, Philips
✓Red file

ATTACHMENT I

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.

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.

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.