

File
Phillips

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MEMORANDUM

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TO: Stephanie Kruse, RCRA Permitting Program

FROM: Teri Davis, RCRA Technical Compliance Program

THROUGH: Ronald A. Kern, Technical Compliance Program Manager *R.A.K.*

DATE: November 1, 1995

SUBJECT: **Technical Review of Phillips Semiconductors RCRA Closure Plan, Sampling Plan (Performance Standards), dated October 1995, for Hazardous Waste Storage Areas, Albuquerque, New Mexico.**

On October 30, 1995, the Technical Compliance Program received proposed performance standards for specific volatile organics in the form of a table (Table 3) from the Permitting Program which was submitted by the facility in support of the sampling and analysis plan (SAP) submitted as an addendum to Phillips Semiconductors RCRA Closure Plan, dated September 1995. After review of Table 3, the following comments are offered:

1) The performance standards for specific volatile organic constituents presented in Table 3, appear to be based on HRMB's Notice of Deficiency, dated October 20, 1995, which recommended that these standards be based on risk-based concentrations presented in the latest version of the EPA Region III Risk-Based Concentration Table. However, the rinsate standards are not presented in the correct units of measurement. The rinsate standards should be in parts per billion and not in parts per million as presented in Table 3. Also, the soil standards listed are based on an industrial land-use scenario. The standards for performance should be residential unless Phillips Semiconductor has a deed restriction for this site.

cc: Red File
Barbara Hoditschek