

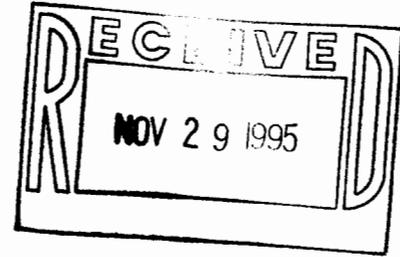


UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6  
1445 ROSS AVENUE, SUITE 1200  
DALLAS, TX 75202-2733

ENTERED

November 24, 1995



Ms. Barbara Hoditschek, Manager  
RCRA Permitting Program  
New Mexico Environment Department  
2044A Galisteo Street  
Santa Fe, NM 87505

Dear Ms. Hoditschek:

The Environmental Protection Agency has reviewed the Philips' RCRA Closure Plan Revision and the Philips' RCRA Closure Plan Addendum - Sampling Plan, and offers the attached comments.

Please contact Nancy Morlock of my staff at (214) 665-6650 if you have any questions or require additional information.

Sincerely yours,

*for*

David W. Neleigh, Chief  
New Mexico-Federal Facilities

Attachment

cc: Stephanie Kruse, NMED

**EPA Comments**  
**Philips Semiconductors, Inc.**  
**Sampling and Closure Plans**

1. Section 2.2, Flammable Storage #4  
Section 3.2.2, Flammable Storage Area #4 (SAMPLING PLAN)  
The second paragraph of Section 2.2 describes the collection of three samples beneath the concrete floor. However, no sample depth or interval is specified. The Sampling Plan should specify the soil sampling interval, ie. 0-6 inches below grade.
  
2. Section I.1.a, Closure Performance Standard (CLOSURE PLAN)  
The last sentences of the section state that "Based upon the results of soil samples collected, a determination will be made concerning potential impact to ground water. If soil sampling indicates that there may be an impact to groundwater, the groundwater will be remediated." Because the Hazardous and Solid Waste Amendments (HSWA) portion of the Philips RCRA Permit may also require a soil and ground water investigation, this section should be revised to state that "... a determination will be made concerning potential impact to ground water **from the waste storage areas...**"
  
3. Section I.1.d, General Closure Procedures (CLOSURE PLAN)  
The last paragraph of this section on page 77 states that "Soil contamination is avoided because the wastes are stored in tanks situated within coated concrete vaults to provide primary and secondary containment." Because the use of the word "avoided" may be too definitive, EPA recommends replacing the sentence with "Soil contamination is **not anticipated** because..."
  
4. Section I.1.e, Decontamination and Closure of Drum Storage (CLOSURE PLAN)  
There is a typographical error midway through the first paragraph "For material collected in Chemical Storage #2, analysis will determine the level of mercury and/or Oarsenic..."