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M E M O R A N D U M

TO: Enforcement File
FROM: Frank Sanchez, RCRA Inspector
DATE: December 27, 1995
SUBJECT: Closure of Storage Permit

Upon invitation of NMED on Wednesday, December 27, 1995, I visited Philips Semiconductor, Inc. to observe the closure being conducted on the permitted hazardous waste storage sites at the plant. Closure activities began December 20, 1995 and are expected to continue through January 15, 1995.

Initially, the modified closure plan and the sampling and analysis plan were reviewed (see attached). Activities conducted at Philips have followed the plan and final sampling results are expected by January 11, 1995. Upon review of results by Mike Brazie, P.E. (ERM-Rocky Mountain, Inc.), a final certification insuring clean closure will be furnished to the Secretary of NMED.

A physical inspection of the areas being closed was conducted. Room CS-2, which used to house Arsenic and Mercury waste will no longer be used for waste storage as only product will be stored in this room. The waste Hydrofluoric acid, waste Oxide etch, and waste solvent tanks and all connected piping have been cleaned and rinsate samples have been collected. All hazardous wastes collected during the closure have been shipped off-site for disposal. These wastes include 2500 gallons of waste acetone (D001, F003), 300 gallons of waste N-Butyl Acetate (D001, F003), 150 pounds of Methanol/Acetone (D001, D009, and F003) contaminated PPE, 2000 pounds of waste Methanol/Acetone (D001, F003, and D009), and 500 pounds of contaminated PPE used in cleanup operations.

In addition, the RCRA Closure checklist was completed. Some questions were left pending upon final sample analysis review by NMED and final certification of the closure by a registered P.E.

cc: Stephanie Kruse, RCRA Permitting