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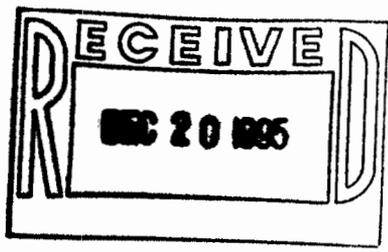
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Philips Semiconductors

December 18, 1995

Philips Semiconductors
a North American Philips Company
9201 Pan American Freeway, NE
Albuquerque, New Mexico 87113
(505) 822-7000

Stephanie Kruse, Project Manager
Permits Section
NMED
2044 Galisteo Street
Santa Fe, NM 87505



Certified Mail: P 555 298 870

SUBJECT: Philips Semiconductors (NMD000709782) RCRA Closure

Dear Ms. Kruse:

As we discussed on the phone last week, our contracted lab (ATI of NM) is having problems meeting the rinsate performance standards for eight of the volatile organic compounds. (They can, however, meet the soils standards.) According to ATI, the analytical methods specified for VOAs (8240/8260) have practical quantitation limits (PQL) for certain compounds that are above the rinsate performance standard. Therefore, it is technically infeasible to reach the rinsate standards. Several other labs have confirmed that these limits are technically unreachable. The compounds with limitations are as follows:

Compound	Rinsate Performance Standard (µg/L)	EPA 8260 PQL (µg/L)
Benzene	0.36	1.0
Carbon Tetrachloride	0.16	1.0
Chloroform	0.15	1.0
1,1-Dichloroethylene	0.044	1.0
1,2-Dichloroethane	0.12	1.0
Tetrachloroethylene	1.1	1.0
Trichloroethylene	1.6	2.5
Vinyl Chloride	0.019	5.0

Because we are planning continued use of the tank and storage area after Closure and because of the technical infeasibility of the performance standards, we would ask that the performance standards be increased to the PQL for the above-mentioned compounds. These numbers may still be greater than what can be practically met with our Closure methods. In fact, according to IT Corporation, it is impossible to clean-close a solvent tank to these levels that will be left in service. The metal would have to be heated to at least 400 °C to drive off the residual volatile

organics. We will try our best to meet the rinsate standards but hope you will be willing to discuss this matter with us again in the case that the standards cannot be met.

In addition to the above limitations, Method 8260 cannot be used for methanol analysis due to the fact that a methanolic solution is added to the sample for surrogate recovery. ATI proposes to use a modified method 8015 instead.

Finally, on page 78 of the Closure Plan, the closure performance standard calls for total organic carbon testing. As discussed earlier, we had eliminated this test from the performance standard due to the fact that we are being held to the more stringent volatile organic rinsate standards. We will not be testing for total organic carbon.

Please let me know by December 20, 1995, whether or not we can increase the limit of the eight mentioned compounds and change the method for methanol analysis. Thanks for your help and if you have questions, please contact me at 822-7634.

Sincerely,



Melanie McKinley
Environmental Engineer

(ENV147)

cc: Jim Cochran, EHS Manager
Terry Sullivan, Site Operations Manager
Keith Hampe, Vice President, Albuquerque Operations
Devon Jercinovic, IT