



*State of New Mexico*  
**ENVIRONMENT DEPARTMENT**  
*Hazardous & Radioactive Materials Bureau*  
 2044 Galisteo  
 P.O. Box 26110  
 Santa Fe, New Mexico 87502  
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DEPUTY SECRETARY

December 21, 1995

Mr. Keith Hampe, Vice-President  
 Albuquerque Operations  
 Philips Semiconductors  
 9201 Pan American Freeway  
 Albuquerque, New Mexico 87113

Post-it® Fax Note 7671		Date 1/3/96	# of pages ▶ 2
To Melanie McKinley	From Stephanie Krause		
Co./Dept. Philips Semiconductors	Co. NMED		
Phone # 822-7634	Phone # 827-1561		
Fax # 505/822-7429	Fax # 505/827-1544		

RE: RCRA Permit No NMD000709782

Dear Mr. Hampe:

This letter responds to Philips' letter of December 18, 1995 signed by Melanie McKinley regarding performance standards to be used in the closure of Philips' RCRA storage permit.

1. For compounds whose practical quantitation limits (PQLs) are greater than the performance standard, the PQL may be used as the performance standard. This guidance is applicable for the eight compounds listed in Philips' December 18, 1995 letter.
2. With regard to cleaning the tanks, every effort should be made to meet rinsate performance standards as described in the approved modified closure plan. PQLs may be used as performance standards for certain compounds as discussed above. If certain of these standards cannot be met, we will work with you to arrive at acceptable concentrations. Our discussion at that time will be based on consideration that the tanks will be put back into use and that there be no threat to human health or the environment.
3. The modified Method 8015 is an acceptable replacement for Method 8260 for analysis of methanol.
4. We agree that Philips need not test for total organic carbon (TOC). TOC was the acceptable test for organics in 1986, when the Philips RCRA permit was issued. Since then, TOC has been replaced by other, more precise methods. Although all other references to TOC testing were removed from the permit at the time of the November 1995 modifications, the reference on page 78 of the revised closure plan was overlooked.

Mr. Keith Hampe  
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Under 20 NMAC 4.1, Subpart IX, 40 CFR 270.42, Appendix I.B.a., changes in waste sampling or analysis methods in response to Department guidance are a Class I modification. Accordingly, we request that Philips notify all persons, agencies, and organizations on the NM Environment Department's mailing list of the above changes. The mailing list was supplied to Philips in November 1995. Please also submit a copy to us for our records.

The New Mexico Hazardous Waste Fee Regulations (HWFR-1) require the assessment of permit fees for permit modifications. Permit modifications classified as Class I (minor) by the Fee Regulations may be accomplished with minimum file review and administrative support (HWFR-1, Subpart 206.B.1.) The Class I modifications to amend the above items are subject to a fee of \$1,000.

Please send payment by check made out to **NMED Hazardous Waste Permit Fees** and send by **Certified Mail** to:

Ms. Chika Ezeanyim  
NM Environment Department  
Hazardous and Radioactive Materials Bureau  
2044 Galisteo Street  
P.O. Box 26110  
Santa Fe, New Mexico 87502

Please indicate the following information on the remittance:

**Activity 50, Rev. Code 339-2319**

This fee must be paid within thirty (30) calendar days of your receipt of this letter.

Please contact Stephanie Kruse of my staff at 827-1561 if you have any questions regarding these changes.

Sincerely,

*Coby Muckelroy*  
for Benito J. Garcia, Chief  
Hazardous and Radioactive Materials Bureau

xc: Barbara Hoditschek, NMED  
Coby Muckelroy, NMED  
Teri Davis, NMED  
Melanie McKinley, Philips  
Nancy Morlock, EPA  
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