

PSC 97

MEMO

ENTERED

To: Stu Dinwiddie, manager, RPMP
From: Susan Hoines SH
Subject: Philips Semiconductors
Date: October 1, 1997

This memo is in regards to a request by Philips Semiconductors (PS) to reduce its ground water sampling frequency from quarterly to annually. PS is expecting a permit modification to do this. The justification PS offered for this permit modification is the following:

1. PS has monitored the wells for six quarters. PS has voluntarily monitored the wells for the previous seven years on a quarterly basis.
2. The only organic compound consistently detected is PCE. Its concentration has decreased over time in all of the wells.
3. PS has never used PCE. PCE is assumed to be a contaminant from the underlying Coronado Landfill. PS has recently been privy to some information from the city of Albuquerque indicating that the Coronado Landfill is of limited extent. PS hopes to show us in the near future that the contamination is originating from the Nazareth Landfill. The Nazareth Landfill does not intersect PS property. Therefore PS anticipates applying for another permit modification to eliminate the RFI process entirely. In the mean time, PS is spending \$12,000.00 per sampling event.
4. The levels of PCE have not changed significantly over the past six quarters.

The trouble is, I'm sure we should not grant them this permit modification. The PCE levels did not drop below the MCL until the very last quarter. It would be good to have three or more quarters of data indicating that PCE levels will stay below MCL regardless of seasonal water table fluctuations. This is my professional judgement.

For now, PS cannot prove that the Coronado Landfill is not contributing to the plume. With the exception of Monitor Well 3, all the monitor wells on the PS property have PCE between 5 and 10 ppb. All of the well locations lie within the Coronado Landfill boundaries.

Should we assess PS a permit modification fee?