

PSC 99

interoffice
MEMORANDUM



To:  Steve Pullen, Stu Dinwiddie

From: Kirby Olson 

Subject: Philips Semiconductor, Request for Reduced Monitoring Requirements

Date: February 5, 1999

In the cover letter to the May 27, 1996 ground water monitoring report Philips Semiconductor requested a reduction of testing requirements from analysis of all 40 CFR Appendix IX constituents to testing only for VOCs, and for testing semi-annually instead of quarterly. Technical comments from Barbara Hoditschek (and possibly from Teri Davis) proposed that the facility monitor for all 40 CFR Appendix IX constituents quarterly for at least a year to establish a baseline of possible contamination migrating from the facility. These comments were sent to Philips Semiconductor with a letter dated June 4, 1996.

Two years of quarterly monitoring reports have been submitted by the facility. To date, only VOCs (almost exclusively PCE) selenium, and barium have been detected in the samples. The levels of barium-which shows up in all wells-have been essentially constant for the two years and may represent background levels. Very low levels of selenium (below MCL) has shown up each quarter in a single well. Based on the two years of monitoring results, PCE appears to be the sole contaminant of concern to date at this site.

The HSWA module of the RCRA permit as modified in 1996 specifies quarterly monitoring for all 40 CFR Appendix IX constituents in Sections C.1.a. and C.1.b., but allows for proposal of target compounds once there is adequate data to verify that these target compounds are reliable surrogates for all contaminants of concern.

Since the monitoring requirements appear in the HSWA module of the permit, reductions in the frequency of monitoring or the suite of analytes constitute a Class I modification to the permit. Under the new fee regulation, the fee for this modification would be \$1,000. I suggest that I contact the facility to inform them of the cost and our proposal for reducing sampling to only VOCs every other quarter and a full Appendix IX analysis during the alternating quarters. I would ask them to submit a new request letter if they still wish to pursue this avenue. Please let me know if you believe this approach will present any problems for us.

- CONSIDERABLY A LESSENING OF ANY REQUIREMENTS IS MORE THAN A CLASS I MOD. PERHAPS BECAUSE THE CONDITIONS OF THE 900 MOD. HAVE BEEN COMPLETED THIS CAN JUSTIFIABLY BE CONSIDERED A CLASS I CHANGE.
- THE FACILITY SHOULD ADDRESS THE "BASELINE" AND "TARGET COMPOUND" ISSUES BEFORE WE CHANGE THE PERMIT LANGUAGE. TO DISCUSS GENERAL GROUNDWATER INDICATOR PARAMETERS.
- PLEASE KEEP THIS MONITORING PROGRAM IN MIND WHILE ADDRESSING THE HYDROLOGICAL CLASS. PERHAPS YOU CAN GET THE PS PERSON A SPOT IN THE COURSE.