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MEMORANDUM

TO: Gregory J. Lewis, Director
Water and Waste Management Division

FROM: Kirby Olson, Environmental Specialist
Hazardous and radioactive Materials Bureau

RE: **RCRA Class I (with prior Agency approval) Permit Modification for Philips Semiconductors, Inc.**

DATE: December 21, 1999

The accompanying letter approves a Class I (with prior Agency approval) RCRA permit modification for Philips Semiconductors, Inc. to allow them to change from quarterly to annual monitoring for some of their groundwater monitoring wells. These wells serve to detect PCE contamination that was found in the ground water at the site and may originate from an old municipal landfill that lies under the site and predates the facility. I believe the requested modification is justified for the following reasons:

- Quarterly monitoring results from the wells in question have been taken for over 12 quarters, and the levels of PCE detected in each well have been fairly stable. Reducing the frequency of monitoring should not compromise the information obtained for the investigation.
- Three new monitoring wells will be installed (see attached map showing all well locations) in accordance with the approved RFI Work Plan. These new wells will be monitored on a quarterly basis for at least 8 quarters.

The proposed changes to the permit language are summarized below:

- The reference to MW-3 has been deleted because that well has gone dry and a replacement well is planned.
- MW-1, MW-2, and MW-4 are changed from quarterly to annual monitoring.
- Language has been added allowing other wells constructed by Philips Semiconductors to automatically go from quarterly to annual monitoring provided that 8 quarters of analyses

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show PCE below 10 ppb. This condition serves as a cap to ensure that only wells that show results consistent with current site conditions can automatically go to longer times between monitoring. The 10 ppb of PCE is not a standard; it represents a ceiling concentration which wells at the site have not exceeded in the last 12 months and therefore reflects current levels in groundwater at the site.

- The NCLF wells installed by the City of Albuquerque should be sampled as planned in the RFI Work Plan, but they are not referenced in the permit because they do not belong to Philips Semiconductors.
- The reference to screening wells at the bottom of the aquifer for DNAPLs is removed since this constraint is appropriate to confined aquifers. The Albuquerque aquifer does not fit the standard definition of a confined aquifer. The permit can state that wells can be constructed in accordance with the RFI Work Plan because the RFI Work Plan has been approved

The requested modification will substantially reduce the monitoring costs to the facility without compromising the investigation and characterization of the site, and I request that you sign the letter approving the modification.

Cc: Stephanie Kruse, Supervisor, HRMB
John Kieling, Acting Program Manager, HRMB
James P. Bearzi, Chief, HRMB