



BILL RICHARDSON
GOVERNOR

State of New Mexico *P.S.C. 04*
ENVIRONMENT DEPARTMENT

Hazardous Waste Bureau
2905 Rodeo Park Drive East, Building 1
Santa Fe, New Mexico 87505-6303
Telephone (505) 428-2500
Fax (505) 428-2567
www.nmenv.state.nm.us



RON CURRY
SECRETARY

DERRITH WATCHMAN-MOORE
DEPUTY SECRETARY

September 27, 2004

Robert T. Sanders
Manager Security Department
Philips Semiconductor
9201 Pan American Freeway, NE, M/S 19
Albuquerque, NM 87113

**RE: RESPONSE TO REQUEST FOR SUPPLEMENTAL INFORMATION: RCRA
FACILITY INVESTIGATION REPORT FOR CORRECTIVE ACTION UNIT #8
(FORMER CORONADO MUNICIPAL LANDFILL) (DATED DECEMBER 2002)
MAY 2003
PHILIPS SEMICONDUCTOR; EPA ID# NMD00070982
HWB-FACILITY-03-001**

Dear Mr. Sanders:

The New Mexico Environment Department (NMED) has reviewed the subject report. Based on our review of the report, and as discussed in our meeting on August 27, 2004, additional information is required:

1. All analytical results for ground-water sampling conducted in August 2004;
2. A map clearly showing the property boundary of the Philips Semiconductor facility and corrective action unit #8;
3. Figures 2.2 and 2.3 shall be resubmitted with the scale indicated on the drawing;
4. Various contaminants have been detected in soil samples collected at the facility. Philips Semiconductors shall compare the levels of these contaminants to NMED Soil Screening Levels and report in Section 2.5 whether these contaminants represent a threat to human health or the environment.

Additionally, in regard to Section 2.5, this part of the report currently concludes that PCE contamination in ground water exceeds the drinking water standard of 5 µg/L. The text in this section also states that there is no pathway to human receptors because of the lack of nearby water-supply wells, and consequently, that there is no risk from the PCE contamination in the

Mr. Robert T. Sanders
September 27, 2004
Page 2

ground water. The NMED does not agree with these latter conclusions. All ground water in New Mexico is protected pursuant to the New Mexico Hazardous Waste Management Regulations (20.4.1 NMAC), regardless of whether it is currently being utilized. The NMED prefers that Philips Semiconductors remove that part of Section 2.5 that states that there is no exposure pathway for humans and that there is no risk to human health due to a lack of an exposure pathway. As discussed in the above referenced meeting, No Further Action should be proposed in Section 2.5 on the basis that no significant source of PCE has been located on Philips Semiconductor property.

Lastly, as requested in the above referenced meeting, Philips Semiconductors may forgo conducting the final quarter of ground-water sampling. Should you have any questions please contact me at (505) 284-5409.

Sincerely,



William S. McDonald
Project Leader
Permits Management Program

WSM:wsm

cc: J. Bearzi, NMED HWB
W. Moats, NMED HWB
L. King, EPA Region 6 (6PD-N)

File: Reading, PSC, HSWA; 04