



JUL 15 1998

CITY OF FREMONT FACILITY CLOSURE NOTIFICATION FORM

Facility Name: PRITRON TECHNOLOGY CORPORATION
EPA ID#: CAL 000114779

Facility Address: 5045 BRANDIN CT., FREMONT, CA 94538

Mailing Address: 5045 BRANDIN CT. FREMONT, CA 94538

Business phone: _____ Contact Person/Title: _____

No hazardous or potentially hazardous items are to be removed from the site until the closure notification form has been submitted and approved.

Check all boxes relating to the facility to be closed:

- | | |
|--|---|
| <input type="checkbox"/> Generates hazardous waste | <input type="checkbox"/> Underground tanks |
| <input type="checkbox"/> Waste treatment system | <input type="checkbox"/> Aboveground tanks |
| <input type="checkbox"/> Discharges to sanitary sewer | <input type="checkbox"/> Wet floor operation |
| <input type="checkbox"/> Vehicle or engine maintenance | <input type="checkbox"/> Tier II reporting required |
| <input type="checkbox"/> Radioactive materials | <input type="checkbox"/> Biohazards |
| <input type="checkbox"/> HMMP on file | <input type="checkbox"/> CFC or HCFC |
| <input type="checkbox"/> Acutely hazardous materials | <input type="checkbox"/> Plating shop |
| <input type="checkbox"/> One piece of equipment only | <input type="checkbox"/> Semiconductor fab |
| <input type="checkbox"/> More than one building | <input type="checkbox"/> Dispensing of flammables |
| <input type="checkbox"/> BAAQMD permit | <input type="checkbox"/> CRC on surfaces |
| <input type="checkbox"/> Compressed gas cylinder(s) | <input type="checkbox"/> Barrel/drum storage |
| <input checked="" type="checkbox"/> Scrubbers/fume hoods/ducting | <input type="checkbox"/> Trenches/gas cabinets |
| <input type="checkbox"/> Sumps, hoists | <input checked="" type="checkbox"/> Chemical storage cabinets |
| <input type="checkbox"/> Structural modifications | <input type="checkbox"/> Degreaser unit |

A closure notification plan approved by the Fremont Fire Department is required for Hazardous Materials Facilities that are to be closed or for any storage area(s) that is to be closed. Facility Closure Notifications are to be submitted no less than 30 days prior to the intended date of closure.

This document must be signed by the Facility Manager, an Officer of the Company, property owner, or other responsible party (not the consultant or contractor).

I hereby certify under penalty of perjury that the information contained in this FACILITY CLOSURE NOTIFICATION is true and correct. I recognize the Fremont Fire Department has full right-of-entry to my complete facility for the purpose of investigation and inspection to demonstrate compliance with this Application and applicable state and local regulations.

Authorized Signature/Title: *Byron W. Brill* Byron W. Brill
PROPERTY MANAGER
FREESTONE PROPERTIES, INC.

Print Name/Date: Byron W. Brill 8/3/98
650-329-9030

City Of Fremont Fire Department
39100 Liberty Street
Fremont Ca 94538
510-494-4279

MAY 12 1998

PROTON TECHNOLOGY CORPORATION
5035 & 5045 Brandin Court
Fremont, CA 94538

FACILITY DECOMMISSIONING REPORT
Report Date: May 4, 1998

Prepared for: Mr. Byron Brill of Brandin Court T.I.C.

Prepared by: John Schultz
California Environmental Management Service Co., Inc.
P.O. Box 390874
Mountain View, CA 94039-0874
(650) 966-1526

May 4, 1998

**Proton Technology Corporation
Facility Decommissioning Report**

I. Introduction

This Facility Decommissioning Report contains a review of the equipment removal, and the decontamination and disposal actions conducted for the decommissioning of the printed circuit board assembly operations of Proton Technology Corp. (Proton), at 5035 & 5045 Brandin Court, Fremont, California. This work was conducted at direction of Mr. Byron Brill of Brandin Court T.I.C., the owners of the property (the Landlord). The decommissioning activities took place between March 1 and April 15, 1998 and were completed by Brandin Court T.I.C., the Landlord, on behalf of Proton Technology Corp., the Tenant, who vacated the facility without notice, and who was not able to pay for the work. The Landlord was assisted by California Environmental Management Service Co., Inc. (CEMS), the environmental consultant for Brandin Court, T.I.C., in the decommissioning of the property.

By way of background, Proton Technology Corp. operated the printed circuit board assembly operation at this location from February 1, 1993 until March 13, 1998. The activities conducted at the site, in support of the printed circuit board assembly operation, included: Selective soldering, wave soldering operations, hot air levelling, board cleaning, and assembly operations. The primary hazardous materials used in support of these operations were were: Isopropyl alcohol, solder flux, degreasing via solvent, caustic materials used for cleaning, and lead for soldering and reflow. A facility wide inspection showed that Proton had removed all hazardous materials and wastes, and only lead, as a pervasive and widespread low level contaminant had been targeted as a potential site contaminant of any significance or concern.

The goal of the decommissioning activities was to check for lead contamination, remove and dispose of contaminated exhaust ventilation equipment, check for hazardous waste and hazardous material removal, and to clean and decontaminate the facility as soon as possible. The goal would be obtained by completing the following objectives:

1. Review the current allowable lead standard for facility decommissioning with the local agency.
2. Remove and dispose of all of the contaminated exhaust system equipment and any remaining hazardous materials or wastes at the facility.
3. Coordinate decommissioning activities on behalf of the landlord with other contractors.
4. Testing in the areas of concern where lead contamination was used.
5. Removing all of the exhaust system and disposing of it as a hazardous waste.
6. Completing decontamination work as necessary.
7. Completing confirmation testing for lead decontamination.
8. Documenting the above actions in a formal report on completion of the project.

May 4, 1998

Proton Technology Corporation
Facility Decommissioning Report

II. Summary of Decommissioning Actions

Proton Technology Corporation vacated the premises on or about March 13, 1998. Proton personnel had removed all of their property, including hazardous wastes and materials, excepting the exhaust ventilation systems, which consisted of fume hoods, ductwork, fans, motors, and stacks located at the ceiling and on the roof in the wave solder, hot air leveling, and assembly areas, at 5045 Branding Court.

The other half of the facility, at 5035 Brandin Court, was separated from 5045 Brandin Court by a floor-to-ceiling wall with two doorways and a pass-through window, and was used only for shipping/receiving, parts storage, and assembly operations. No hazardous materials were used in any significant quantity in this area to present any site contamination concerns. The separate HVAC and air supply systems, combined with the floor to ceiling wall dividing the two units, precluded lead migration and contamination from unit 5045, and eliminated these issues in this unit.

Once the equipment and materials were removed, Proton's personnel broom-cleaned the floors. The exhaust system for this equipment was left in place for removal and disposal at a later date by the Landlord. This was done between April 30 and March 3, 1998. The equipment on the roof was partially disassembled and removed for disposal; the exhaust stacks and ductwork were removed and disposed of as hazardous wastes, the blowers, fan housings, fans, and cages were decontaminated in place and were left along with the motors.

The blower fans for the wave solder and hot air leveling exhaust stacks could not be entirely cleaned due to the limited access to the areas needing cleaning, but all of the exposed and accessible surfaces were cleaned (these units were 98% clean and deemed sufficiently decontaminated to present minimal hazard). The inaccessible portions of the blower fans are enclosed directly to the environment or to casual human contact and do not present any hazardous for environmental release or causal human exposure; all of the blower fans were sealed with 10 mil plastic sheeting and duct tape. The Landlord has been advised of this situation, and has approved leaving them in place.

The wash water from this cleanup work was collected using the wet/dry vacuum and was placed in containers where it was solidified using a diatomaceous absorbent and placed in 10 mil heavy duty plastic bags (and doubled bagged) for disposal along with the exhaust system. A minimum amount of cleaning solution and tight water control was used during the cleanup to prevent any discharge to the stormdrain system. Approximately a combined total of 10 gallons of cleaning solution and rinse water was generated, this was solidified and was shipped offsite for disposal. (See the attached Uniform Hazardous Waste Manifest No. 97326712, April 3, 1998).

May 4, 1998

Proton Technology Corporation
Facility Decommissioning Report

III. Summary of Wipe Sample Investigation

On March 26, 1998, Mr. John Schultz of CEMS conducted wipe sampling of the room where the lead use in the printed circuit board assembly operations was being conducted. The purpose of this testing was to determine if there was any lead contamination exceeding the Federal Housing and Urban Development Standards (HUD Standards). The City of Fremont is now using HUD Standards for a Closure standard for facilities using lead and the testing was being conducted to look for any lead meeting or exceeding the Standard. (Reference Ms. Sukla De, C.I.H. for the City of Fremont Hazardous Materials Division, January 21, 1998). The Standard is as follows:

For floors:	100 ug/wipe
For windowsill (and walls):	200 ug/wipe
For non-accessible locations (ceilings and such):	800 ug/wipe

At this time, 22 wipe samples (approximately 1 wipe/450 ft²) and 3 blanks for QA/QC (1 blank/10 wipes) were collected from locations on horizontal surfaces throughout 5045 Brandin Court to check for lead. Wipe samples were collected observing NIOSH Standard wipe sampling protocol. The samples were sent to McCampbell Analytical Inc., a State Certified Hazardous Waste Analytical Testing Laboratory, Certified Laboratory Number 1644, for analyses via Atomic Absorption methodology meeting EPA and NIOSH Analytical Methods 6010/200.7,239.2. (See the attached McCampbell Analytical Report dated April 4, 1998, for Project CEMS/Proton.)

Wipe sampling was completed using 2" square sterile medical cotton gauze wipes, wetted with deionized water. Samples were obtained by wiping an area of approximately 1 square foot in a pattern prescribed by NIOSH. All samples were folded inwards and placed in a zip lock baggie, labelled with the location, date, and time, and placed in an ice chest. A Chain-of-Custody was utilized to document sampling and control transfer of the samples from the site to the laboratory. Blank samples (for QA/QC) were provided to the laboratory along with wipe samples.

The results of the March 26, 1998 sampling event revealed that lead levels exceeded the HUD Standards relating to Lead exposure. See Table I for a summary of the McCampbell Analytical Report dated March 26, 1998, for Project CEMS/Proton, and see the Sample Location Map for where the samples were collected.

Based on a review of the data, and on meeting with Mr. Byron Brill, the representative for the Landlord, it was decided that the project would be expanded to include additional sampling and surface decontamination. First, a general decontamination of the horizontal surfaces of the room would be completed, this would be followed up with confirmation test samples to confirm that a satisfactory

May 4, 1998

Proton Technology Corporation
Facility Decommissioning Report

cleanup had been completed. In addition to this, it was decided that the walls would be spot cleaned where they were noticeably dirty in the locations of the wave solder machine, and then the walls would be re-painted as part of the cleanup.

Table I - Summary of Analytical Data (for Lead only)

Note: See the attached Sample Location Map for additional information

<u>Sample #. - Location</u>	<u>Date</u>	<u>Results</u>	<u>Reporting Limit</u>
WS1 - Lamp	March 26, 97	11,000 ug/wipe	0.5 ug/wipe
WS2 - Ceiling - Source 1 Wave Solder Station	March 26, 97	0.80 ug/wipe	0.5 ug/wipe
WS3 - Ceiling	March 26, 97	0.76 ug/wipe	0.5 ug/wipe
WS4 - Ceiling	March 26, 97	0.59 ug/wipe	0.5 ug/wipe
WS5 - Ceiling - Source 2 Wave Solder Station	March 26, 97	0.97 ug/wipe	0.5 ug/wipe
WS6 - Ceiling - Source 3 Wave Solder Station	March 26, 97	0.91 ug/wipe	0.5 ug/wipe
WS7 - Fire Sprinkler line	March 26, 97	24,000 ug/wipe	0.5 ug/wipe
WS8 - Ceiling - Room Exhaust Fan	March 26, 97	50,000 ug/wipe	0.5 ug/wipe
WS9 - Lamp	March 26, 97	67,000 ug/wipe	0.5 ug/wipe - resampled
WS10 - Ceiling - next to Test Area	March 26, 97	1.5 ug/wipe	0.5 ug/wipe
WS11 - Air Conditioner Louvre	March 26, 97	24,000 ug/wipe	0.5 ug/wipe
WS12 - Air Conditioner Louvre	March 26, 97	18,000 ug/wipe	0.5 ug/wipe
WS13 - Ceiling - Source 4 Wave Solder Station	March 26, 97	ND	0.5 ug/wipe
WS14 - ACH Ductwork	March 26, 97	2,900 ug/wipe	0.5 ug/wipe
WS15 - Ceiling	March 26, 97	0.56 ug/wipe	0.5 ug/wipe
WS16 - Ceiling	March 26, 97	0.82 ug/wipe	0.5 ug/wipe
WS17 - Ceiling	March 26, 97	0.63 ug/wipe	0.5 ug/wipe
WS18 - Ceiling - Source 5 Wave Solder Station	March 26, 97	ND	0.5 ug/wipe
WS19 - Lamp	March 26, 97	5,300 ug/wipe	0.5 ug/wipe
WS20 - Blank (for QA/QC)	March 26, 97	ND	0.5 ug/wipe
WS21 - Floor - Source 1 Wave Solder Station	March 26, 97	1,700 ug/wipe	0.5 ug/wipe
WS22 - Floor - Source 2 Wave Solder Station	March 26, 97	3,700 ug/wipe	0.5 ug/wipe
WS23 - Floor - Source 4 & 5 Wave Solder Station	March 26, 97	4,000 ug/wipe	0.5 ug/wipe
WS24 - Blank (for QA/QC)	March 26, 97	ND ug/wipe	0.5 ug/wipe
WS25 - Blank (for QA/QC)	March 26, 97	ND	0.5 ug/wipe

Note: ug/wipe = micrograms per wipe

ND = Not detected

QA/QC = Quality Assurance and Quality Control Sample

May 4, 1998

**Proton Technology Corporation
Facility Decommissioning Report**

IV. Decontamination Activities & Followup Investigation

Between March 15 and March 30, 1998, a cleanup crew was brought on site to wipe down and clean all of the accessible horizontal surface areas in the former location of the wave solder machines, the hot air leveling units, and spot soldering; all of these were in 5045 Brandin Court. The tops of the fire sprinklers, the light fixtures, lamps, conduit, air lines and other pipe, the tops of the ducting and air returns, service boxes, walls, and any other horizontal surfaces in the vicinity of the wave solder units, were washed with a mild caustic solution consisting of Tri-Sodium Phosphate (TSP), and wiped down with deionized water and towels.

The wash water was placed in 30 gallon drum for solidification by adding diatomaceous absorbent and then "double-bagging" and disposing of it to the hazardous waste disposal container, along with the exhaust ventilation system that had been removed. The sponges, plastic tarp, towels, used disposable safety gear, and other solid debris was added to the exhaust ducting pile for disposal as a solid hazardous waste as well.

On April 4, 1998, a second round of wipe sampling was conducted for confirmation purposes. Five wipe samples were collected from significantly contaminated locations. These samples were sent to McCampbell Analytical for analyses; a single blank sample was provided for QA/QC purposes. All of the samples complied to the HUD Standards and the facility was considered decontaminated with the data showing that the decontamination had been successfully concluded. (See Table II, Confirmation Samples Analytical Summary, and also see the attached McCampbell Analytical Report dated April 22, 1998, for Project CEMS/Proton Technology Corp..)

Table II - Summary of Analytical Data (for Lead only)

Note: See the attached Sample Location Map for additional information

<u>Sample #. - Location</u>	<u>Date</u>	<u>Results</u>	<u>Reporting Limit</u>
SW1 - Floor - Source 1 Wave Solder Station	March 26, 97	68 ug/wipe	0.5 ug/wipe
SW2 - Floor - Source 2 Wave Solder Station	March 26, 97	7.4 ug/wipe	0.5 ug/wipe
SW3 - Floor - Source 3 Wave Solder Station	March 26, 97	ND ug/wipe	0.5 ug/wipe
SW4 - Lamp (@ former WS9 location)	March 26, 97	13 ug/wipe	0.5 ug/wipe
SW5 - Wall (@ former Wave Solder Location)	March 26, 97	7.4 ug/wipe	0.5 ug/wipe
SW6 - Blank (for QA/QC)	March 26, 97	ND ug/wipe	0.5 ug/wipe

Note: ug/wipe = micrograms per wipe

ND = Not detected

QA/QC = Quality Assurance and Quality Control Sample

May 4, 1998

**Proton Technology Corporation
Facility Decommissioning Report**

V. Final Waste Disposal

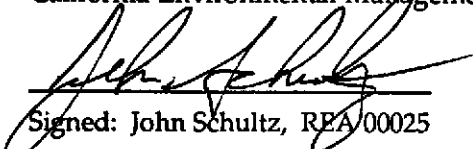
In addition to the 45 - 50 gallons of solidified wash and mop water from cleaning operations, approximately; 160 - 180 linear feet of exhaust ducting, two exhaust hoods, sediment and debris from the roof, exhaust stacks, cleaning materials, and contaminated safety gear, were also disposed of by being placed in the hazardous waste disposal container and shipping this as hazardous waste offsite for disposal. The removal of the exhaust ventilation system was completed by CEMS. The hazardous waste bin and transportation by Phillips Environmental Services, Inc., dba Allwaste. The disposal was at Chemical Waste Management (a Class 1 Landfill), located at Kettleman Hills, California. (See the attached Uniform Hazardous Waste Manifest No. 97326712, April 3, 1998.)

VI. Closing Summary

The exhaust ventilation system that contained hazardous levels of lead contamination, and associated ducts, motors, hoods and housings located on the roof, have either been removed from the site and disposed of as hazardous waste to a permitted facility, or cleaned sufficiently for re-use at the facility. The general room HVAC system, which was lightly contaminated, had surface cleaning and was left in place for future use. The immediate roof area where the exhaust stacks were located were thoroughly cleaned and decontaminated. All of the hazardous wastes from this operation have been disposed of as per regulatory requirements.

VII. Report Preparation

Report prepared for Mr. Byron Brill for Brandin Court T.I.C. by: John Schultz,
California Environmental Management Service Co., Inc.


Signed: John Schultz, REA 00025
State Registered Environmental Assessor

May 4, 1998
Date

Attachments:

McC Campbell Analytical Reports
Uniform Hazardous Waste Manifests
Sample Location Map

May 4, 1998
Proton Technology Corporation
Facility Decommissioning Report

Attachment 1

LEAD WIPE SAMPLING REPORTS

McC Campbell Analytical Report , April 3, 1998
McC Campbell Analytical Report , April 22, 1998



McCAMPBELL ANALYTICAL INC.

110 Second Avenue South, #D7, Pacheco, CA 94553
Telephone : 925-798-1620 Fax : 925-798-1622
<http://www.mccampbell.com> E-mail: main@mccampbell.com

California Environmental Management Service Co., Inc. 2431 Tamalpias Street Mountain View, CA 94043	Client Project ID: CEMS/PROTON	Date Sampled: 03/26/98
		Date Received: 03/26/98
	Client Contact: John Schultz	Date Extracted: 03/26/98
	Client P.O:	Date Analyzed: 03/26/98

04/03/98

Dear John:

Enclosed are:

- 1). the results of 24 samples from your CEMS/PROTON project.
- 2). a QC report for the above samples
- 3). a copy of the chain of custody, and
- 4). a bill for analytical services.

All analyses were completed satisfactorily and all QC samples were found to be within our control limits. If you have any questions please contact me. McCampbell Analytical Laboratories strives for excellence in quality, service and cost. Thank you for your business and I look forward to working with you again.

Yours truly,

Edward Hamilton, Lab Director



McCAMPBELL ANALYTICAL INC.

110 Second Avenue South, #D7, Pacheco, CA 94553
 Telephone : 925-798-1620 Fax : 925-798-1622
<http://www.mcccampbell.com> E-mail: main@mcccampbell.com

California Environmental Management Service Co., Inc. 2431 Tamalpias Street Mountain View, CA 94043	Client Project ID: CEMS/PROTON	Date Sampled: 03/26/98
		Date Received: 03/26/98
	Client Contact: John Schultz	Date Extracted: 03/26/98
	Client P.O:	Date Analyzed: 03/27/98

Lead*

EPA analytical methods 6010/200.7, 239.2*

Lab ID	Client ID	Matrix	Extraction °	Lead*	% Recovery Surrogate
S7353	Lamp	Wipe	TTLC	11,000	NA
S7354	Ceiling 10:05	Wipe	TTLC	0.80	NA
S7355	Ceiling 10:08	Wipe	TTLC	0.76	NA
S7356	Ceiling 10:13	Wipe	TTLC	0.59	NA
S7357	Ceiling 10:17	Wipe	TTLC	0.97	NA
S7358	Ceiling 10:21	Wipe	TTLC	0.91	NA
S7359	Fire Sprinkler	Wipe	TTLC	24,000	NA
S7360	Ceiling Fan	Wipe	TTLC	50,000	NA
S7361	Lamp 10:31	Wipe	TTLC	67,000	NA
S7362	Ceiling 10:37	Wipe	TTLC	1.5	NA
S7363	H.C. Louvrg	Wipe	TTLC	24,000	NA
S7364	H.C. Louvrg 10:15	Wipe	TTLC	18,000	NA
S7365	Ceiling 10:59	Wipe	TTLC	ND	NA
S7366	H.C. Ductwork	Wipe	TTLC	2900	NA
Reporting Limit unless otherwise stated; ND means not detected above the reporting limit	Wipe	TTLC		0.5 ug wipe	
	W	TTLC		0.005 mg/L	
	---	STLC,TCLP		0.2 mg/L	

* soil and sludge samples are reported in mg/kg, wipe samples in ug/wipe, and water samples and all STLC / SPLP / TCLP extracts in mg/L
 ° Lead is analysed using EPA method 6010 (ICP) for soils, sludges, STLC & TCLP extracts and method 239.2 (AA Furnace) for water samples
 ° EPA extraction methods 1311(TCLP), 3010/3020(water,TTLC), 3040(organic matrices,TTLC), 3050(solids,TTLC); STLC - CA Title 22
 * surrogate diluted out of range; N/A means surrogate not applicable to this analysis
 ° reporting limit raised due matrix interference
 i) liquid sample that contains greater than ~2 vol. % sediment; this sediment is extracted with the liquid, in accordance with EPA methodologies and can significantly effect reported metal concentrations.



McCAMPBELL ANALYTICAL INC.

110 Second Avenue South, #D7, Pacheco, CA 94553
 Telephone : 925-798-1620 Fax : 925-798-1622
<http://www.mccampbell.com> E-mail: main@mccampbell.com

California Environmental Management Service Co., Inc. 2431 Tamalpias Street Mountain View, CA 94043	Client Project ID: CEMS PROTON	Date Sampled: 03/26/98
	Client Contact: John Schultz	Date Received: 03/26/98
	Client P.O:	Date Extracted: 03/26/98
		Date Analyzed: 03/27/98

Lead*

EPA analytical methods 6010/200.7, 239.2*

Lab ID	Client ID	Matrix	Extraction °	Lead*	% Recovery Surrogate
S7367	Ceiling 11:02	Wipe	TTLC	0.56	NA
S7368	Ceiling 11:11	Wipe	TTLC	0.82	NA
S7369	Ceiling 11:17	Wipe	TTLC	0.63	NA
S7370	Ceiling 11:20	Wipe	TTLC	ND	NA
S7371	Lamp 11:25	Wipe	TTLC	5300	NA
S7372	Blank	Wipe	TTLC	ND	NA
S7373	Floor 11:40	Wipe	TTLC	1700	NA
S7374	Floor 11:47	Wipe	TTLC	3700	NA
S7375	Floor 12:00	Wipe	TTLC	4000	NA
S7376	Blank 12:02	Wipe	TTLC	ND	NA
S7377	Blank 12:15	Wipe	TTLC	ND	NA
Reporting Limit unless otherwise stated; ND means not detected above the reporting limit	Wipe	TTLC		0.5 ug wipe	
	W	TTLC		0.005 mg L	
	—	STLC,TCLP		0.2 mg-L	

* soil and sludge samples are reported in mg/kg, wipe samples in ug/wipe, and water samples and all STLC / SPLP / TCLP extracts in mg/L
 ° Lead is analysed using EPA method 6010 (ICP) for soils, sludges, STLC & TCLP extracts and method 239.2 (AA Furnace) for water samples
 ° EPA extraction methods 1311(TCLP), 3010/3020(water,TTLC), 3040(organic matrices,TTLC), 3050(solids,TTLC); STLC - CA Title 22
 * surrogate diluted out of range; N/A means surrogate not applicable to this analysis
 ° reporting limit raised due matrix interference
 i) liquid sample that contains greater than ~2 vol. % sediment; this sediment is extracted with the liquid, in accordance with EPA methodologies and can significantly effect reported metal concentrations.

QC REPORT FOR ICP and/or AA METALS

Date: 03/27/98-03/28/98

Matrix: WIPE

Extraction: TTLC

Analyte	Concentration (mg/kg, mg/L)			Amount Spiked	% Recovery		RPD
	Sample	MS	MSD		MS	MSD	
Total Lead	0.0	5.23	5.28	5.0	105	106	0.8
Total Cadmium	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Total Chromium	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Total Nickel	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Total Zinc	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Total Copper	N/A	N/A	N/A	N/A	N/A	N/A	N/A
STLC Lead	N/A	N/A	N/A	N/A	N/A	N/A	N/A

* Rec. = (MS - Sample) / amount spiked x 100

RPD = (MS - MSD) / (MS + MSD) x 2 x 100

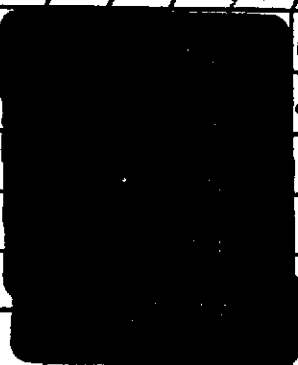
California Environmental Management Service Co., Inc. (650) 966-1526/Fax (650) 965-1146 Chain of Custody

Job code/project name: CEMS/ PROTON					Number of containers	Composite	Analysis	Comments
Sampler(s) signature: <i>[Signature]</i>								
Station No.	Date	Time	Type	Sample ID				
WS-1	3-26-98	10:00	WIP6	LAMP	1			
WS-2		10:05		CEILING	1			
WS-3		10:08		CEILING	1			SOURCE 1
WS-4		10:13		CEILING	1			
WS-5		10:17		CEILING	1			SOURCE 2
WS-6		10:21		CEILING	1			SOURCE 3
WS-7		10:24		FIRE SPRINKLER LINE	1			
WS-8		10:27		CEILING FAN	1			COUPLER -
WS-9		10:31		LAMP	1			
WS-10	✓	10:37	✓	CEILING	1			NEXT TO TEST AREA
Discrepancy notice/additional comments:								
Turnaround time: DUE BY SATURDAY - 8 AM								
Hold Sample for further analyses? Yes () No (<input checked="" type="checkbox"/>)								
Relinquished by: <i>[Signature]</i>			Date: 3/26/98	Time: 12:14	Received by: <i>[Signature]</i> #604		Laboratory: McCannell Analytical Lab. No. 1644 PRESERVATION: <input checked="" type="checkbox"/> APPROPRIATE CONTAINERS	
Relinquished by: <i>[Signature]</i>			Date: 3/26/98	Time: 2:08 PM	Received by: <i>[Signature]</i> 2:08 PM		Sampling Protocol: () LIA () DHS () LUFT () EPA () RWQCB () OTHER	
Relinquished by:			Date:	Time:	Received by:		Bill to: () CEMS () Other	

Job code/project name: CEMS/PROTON					Number of containers	Composite	Analysis LOUVA-AA	Comments RUSH RUSH
Sampler(s) signature: John Schultz <i>[Signature]</i>								
Station No.	Date	Time	Type	Sample ID				
WS-11	3-26-98	10:51	WIRE	A.C. LOUVER		/		
WS-12	1	10:55		A.C. LOUVER		/		
WS-13		10:59		CEILING		/		SOURCE 4
WS-14		11:00		A.C. DUCTWORK		/		TOP OF DUCTWORK
WS-15		11:02		CEILING		/		
WS-16		11:11		CEILING		/		
WS-17		11:17		CEILING		/		
WS-18		11:20		CEILING		/		SOURCE 5
WS-19		11:25	✓	LAMP		/		
WS-20	✓	11:31	✓	BLANK		/		
Discrepany notice/additional comments:								
Turnaround time:		Hold Sample for further analysis? Yes No		ICE/NO		PRESERVATION		
Relinquished by: <i>[Signature]</i>		Date: 3/26/98	Time: 12:10	Received by: STEVEN BOY		VOAS O&G METALS OTHER		
Relinquished by: 51606 #804		Date: 3/24/98	Time: 2:08 PM	Received by: <i>[Signature]</i> 3-26-98 2:08 PM		GOOD CONDITION _____ APPROPRIATE CONTAINERS _____		
Relinquished by:		Date:	Time:	Received by:		SAMPLING PROTOCOL:		
						<input type="checkbox"/> LIA _____ <input type="checkbox"/> DHS _____ <input type="checkbox"/> LUFT _____ <input type="checkbox"/> EPA _____ <input type="checkbox"/> RWQCB _____ <input type="checkbox"/> OTHER _____		
Relinquished by:		Date:	Time:	Received by:		Bill to: <input type="checkbox"/> CEMS <input type="checkbox"/> Other _____		

10819
XCEN42

page 3 of 3

Job code/project name: CBMS/PROTON					Number of containers	Composite	Analysis	Comments
Sampler(s) signature: John Schultz								
Station No.	Date	Time	Type	Sample ID				
WS-21	3-26-98	11:40	WIPG	FLOOR-	1		@ SOURCE 1	
WS-22		11:47		FLOOR	1		@ SOURCE 2	
WS-23		12:00		FLOOR	1		@ SOURCE-4+5	
WS-24		12:02		BLANK	1			
WS-25	✓	12:15	✓	BLANK	1		-EXTRA-BLANK FOR LAB USE IF NEEDED	

Discrepancy notice/additional comments:

Turnaround time: _____ Hold Sample for further analyses? Yes No

ICE/® _____ PRESERVATION APPROPRIATE CONTAINERS _____

VOAS | O&G | METALS | OTHER

GOOD CONDITION _____ HEADSPACE ABSENT _____

Relinquished by: [Signature] Date: 3/26/98 Time: 12:140 Received by: STOVE #604

Relinquished by: STOVE #604 Date: 3/26/98 Time: 9:08 PM Received by: [Signature] 3-26-98 2:09 PM

Relinquished by: _____ Date: _____ Time: _____ Received by: _____

Sampling Protocol:

[] LIA _____ [] DHS _____ [] LUFT _____

[] EPA _____ [] RWQCB _____ [] OTHER _____

Bill to: [] CEMS [] Other _____



McCAMPBELL ANALYTICAL INC.

110 Second Avenue South, #D7, Pacheco, CA 94553
Telephone : 925-798-1620 Fax : 925-798-1622
<http://www.mccampbell.com> E-mail: main@mccampbell.com

California Environmental Management Service Co., Inc. 2431 Tamalpais Street Mountain View, CA 94043	Client Project ID: Proton Technology Corp.	Date Sampled: 04/14/98
		Date Received: 04/15/98
	Client Contact: John Schultz	Date Extracted: 04/15/98
	Client P.O:	Date Analyzed: 04/15/98

04/22/98

Dear John:

Enclosed are:

- 1). the results of 6 samples from your Proton Technology Corp. project.
- 2). a QC report for the above samples
- 3). a copy of the chain of custody, and
- 4). a bill for analytical services.

All analyses were completed satisfactorily and all QC samples were found to be within our control limits. If you have any questions please contact me. McCampbell Analytical Laboratories strives for excellence in quality, service and cost. Thank you for your business and I look forward to working with you again.

Yours truly,

Edward Hamilton, Lab Director



McCAMPBELL ANALYTICAL INC.

110 Second Avenue South, #D7, Pacheco, CA 94553
 Telephone : 925-798-1620 Fax : 925-798-1622
<http://www.mccampbell.com> E-mail: main@mccampbell.com

California Environmental Management Service Co., Inc. 2431 Tamalpias Street Mountain View, CA 94043	Client Project ID: Proton Technology Corp.	Date Sampled: 04/14/98
		Date Received: 04/15/98
	Client Contact: John Schultz	Date Extracted: 04/15/98
	Client P.O:	Date Analyzed: 04/16/98

Lead*

EPA analytical methods 6010/200.7, 239.2*

Lab ID	Client ID	Matrix	Extraction °	Lead*	% Recovery Surrogate
88142	SW-1 floor #1	Wipe	TTLC	68	NA
88143	SW-2 floor #2	Wipe	TTLC	7.4	NA
88144	SW-3 floor #3	Wipe	TTLC	ND	NA
88145	SW-4 lamp	Wipe	TTLC	13	NA
88146	SW-5 wall	Wipe	TTLC	7.4	NA
88147	SW-5 blank	Wipe	TTLC	ND	NA
Reporting Limit unless otherwise stated: ND means not detected above the reporting limit	Wipe	TTLC		0.5 ug wipe	
	W	TTLC		0.005 mg/L	
	---	STLC,TCLP		0.2 mg/L	

* soil and sludge samples are reported in mg/kg, wipe samples in ug/wipe, and water samples and all STLC - SPLP - TCLP extracts in mg/L
 ° Lead is analysed using EPA method 6010 (ICP) for soils, sludges, STLC & TCLP extracts and method 239.2 (AA Furnace) for water and wipe samples
 ° EPA extraction methods 1311(TCLP), 3010/3020(water,TTLC), 3040(organic matrices,TTLC), 3050(solids,TTLC); STLC - CA Title 22
 ° surrogate diluted out of range; N/A means surrogate not applicable to this analysis
 * reporting limit raised due matrix interference
 i) liquid sample that contains greater than ~2 vol. % sediment; this sediment is extracted with the liquid, in accordance with EPA methodologies and can significantly effect reported metal concentrations.

Edward Hamilton, Lab Director

QC REPORT FOR ICP and/or AA METALS

Date: 04/16/98

Matrix: WIPE

Extraction: TTLC

Analyte	Concentration (mg/L)			Amount	% Recovery		RPD
	Sample	MS	MSD		MS	MSD	
Total Lead	0.00	4.94	4.72	5.00	99	94	4.6
Total Copper	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Total Zinc	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Total Nickel	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Total Zinc	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Total Copper	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Organic Lead	N/A	N/A	N/A	N/A	N/A	N/A	N/A

$$\% \text{ Rec.} = (\text{MS} - \text{Sample}) / \text{amount spiked} \times 100$$

$$\text{RPD} = (\text{MS} - \text{MSD}) / (\text{MS} + \text{MSD}) \times 2 \times 100$$

Job code/project name: CEMS/PROTON TECHNOLOGY CORP. (CONFIRMATION WIPE SAMPLES)					Number of containers	Composite	Analysis						Comments
Sampler(s) signature: John Schultz <i>[Signature]</i>							LEAD						
Station No.	Date	Time	Type	Sample ID									
SW-1	4-14-98	7:42 PM	WIPE	SW-1 FLOOR #1	1								(WAVE SOLDER-N.E.)
SW-2	4-14-98	7:44 PM	WIPE	SW-2 FLOOR #2	1								(WAVE SOLDER-N.W.)
SW-3	4-14-98	7:46 PM	WIPE	SW-3 FLOOR #3	1								(SOLDER STATION)
SW-4	4-14-98	7:48 PM	WIPE	SW-4 LAMP	1								OVER HEAD LAMP
SW-5	4-14-98	7:50 PM	WIPE	SW-5 WALL	1								PAGE LEVEL
SW-6	4-14-98	7:52 PM	WIPE	SW-5 BLANK	1								BLANK
Discrepany notice/additional comments:					ICE <input checked="" type="checkbox"/>	PRESERVATION		VOAS	O&G	METALS	OTHER		
Turnaround time: <u>NORMAL</u> Hold Sample for further analyses? Yes (No)					GOOD CONDITION <input checked="" type="checkbox"/>	APPROPRIATE							
					HEAD SPACE ABSENT <input checked="" type="checkbox"/>	CONTAINERS <input checked="" type="checkbox"/>							
Relinquished by: <i>[Signature]</i>	Date: 4-15-98	Time: 10:50	Received by: <i>[Signature]</i>	Laboratory: McCampbell Analytical (Lab. No.1644)									
Relinquished by: <i>[Signature]</i>	Date: 4-15-98	Time: 1:55	Received by: <i>[Signature]</i>	Sampling Protocol:									
Relinquished by:	Date:	Time:	Received by:	<input type="checkbox"/> LIA <input type="checkbox"/> DHS <input type="checkbox"/> LUFT <input type="checkbox"/> EPA <input type="checkbox"/> RWQCB <input type="checkbox"/> OTHER									
Relinquished by:	Date:	Time:	Received by:	Bill to <input checked="" type="checkbox"/> CEMS <input type="checkbox"/> Other									

88142
88143
88144
88145
88146
88147

May 4, 1998
Proton Technology Corporation
Facility Decommissioning Report

Attachment 2

UNIFORM HAZARDOUS WASTE MANIFESTS

UHWM No. 97326712, dated April 3, 1998

97326712
 IN CASE OF EMERGENCY OR SPILL, CALL THE NATIONAL RESPONSE CENTER 1-800-424-8802; WITHIN CALIFORNIA, CALL 1-800-852-7550
 GENERATOR

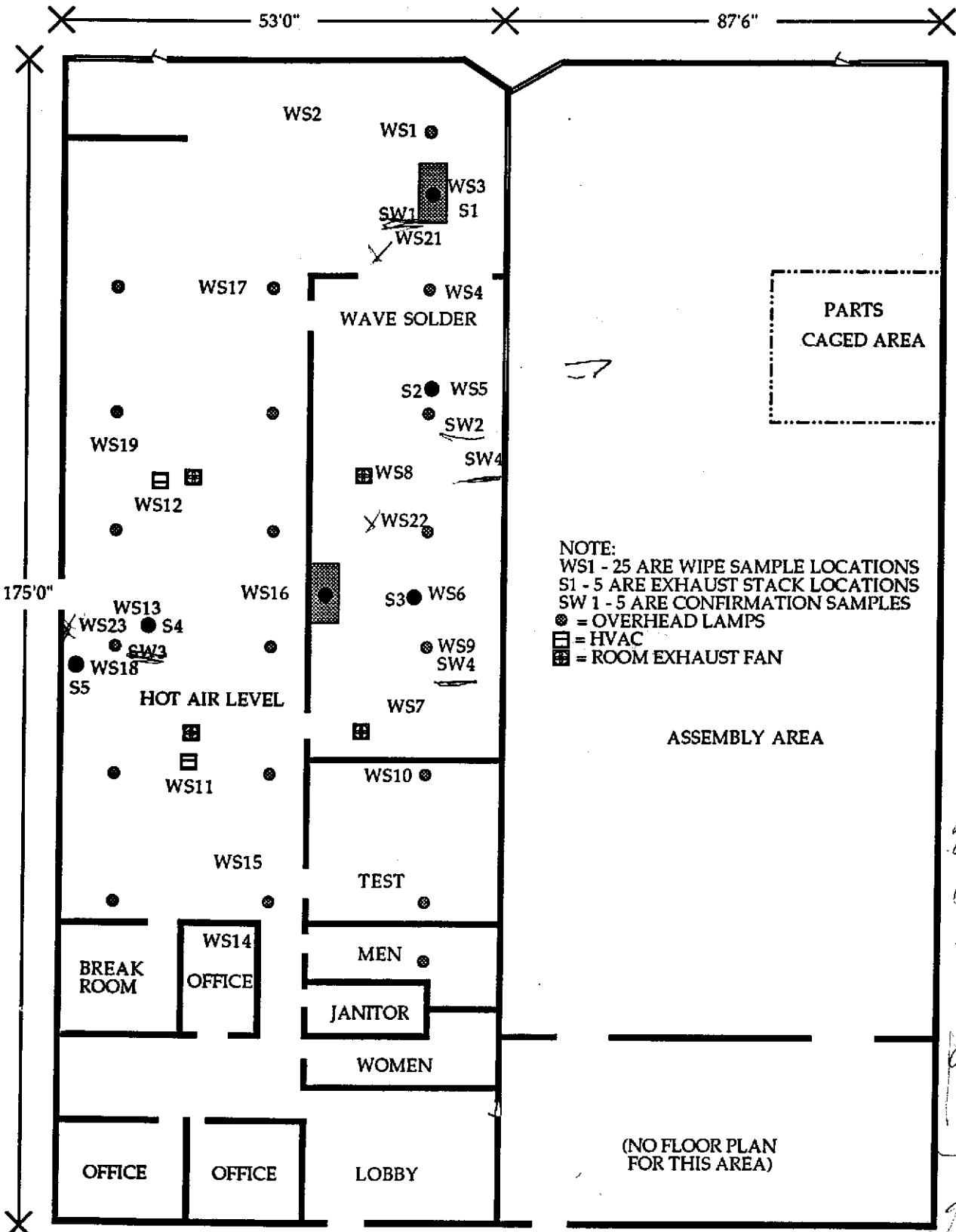
UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. CAL000114779		Manifest Document No. 26712		2. Page 1 of 1		Information in the shaded areas is not required by Federal law.			
3. Generator's Name and Mailing Address PROTON TECHNOLOGY CORPORATION 5045 BRANDIN COURT FREMONT, CA 94538 4. Generator's Phone 650-329-9030											
5. Transporter 1 Company Name ALLWASTE TRANSPORTATION & REMEDIATION INC.					6. US EPA ID Number CALD063547996						
7. Transporter 2 Company Name					8. US EPA ID Number						
9. Designated Facility Name and Site Address CHEMICAL WASTE MANAGEMENT, INC. 35251 OLD SKYLINE ROAD KETTLEMAN CITY, CALIF. 93239											
10. US EPA ID Number CAT000646117											
11. US DOT Description (including Proper Shipping Name, Hazard Class, and ID Number)						12. Containers		13. Total Quantity		14. Unit	
HAZARDOUS WASTE SOLID, N.O.S., 9, NA3077, PG III, (LEAD)						No. Type		Quantity		Wt/Vol	
						0 0 1 C M		00006		Y	
b.											
c.											
d.											
15. Special Handling Instructions and Additional Information 24 HOUR EMERGENCY CONTACT: ALLWASTE INC./JOSE NEGRETE (800) 321-1030 WEAR PROTECTIVE CLOTHING & EYEWEAR											
R.R.G. # 11a. 171 11b. 11c. 11d.											
ATR SAN MARTIN POC: 17803465 JOB#: 8028-90											
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.											
If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.											
Printed/Typed Name BYRON PRILL				Signature <i>Byron Prill</i>				Month Day Year 04 03 98			
17. Transporter 1 Acknowledgement of Receipt of Materials											
Printed/Typed Name GORDON BUXLER				Signature <i>Gordon Buxler</i>				Month Day Year 04 03 98			
18. Transporter 2 Acknowledgement of Receipt of Materials											
Printed/Typed Name				Signature				Month Day Year			
19. Discrepancy Indication Space											
20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.											
Printed/Typed Name				Signature				Month Day Year			

DO NOT WRITE BELOW THIS LINE.

May 4, 1998
Proton Technology Corporation
Facility Decommissioning Report

Attachment 3

SAMPLE LOCATION MAP



*Sample need
 about
 WS1 lamp
 WS1 fire
 Air
 condition
 (WS11+12)
 how
 come no
 walls?
 Exhaust
 fan*

*I need to
 separate
 the
 walls?*

5045 BRANDIN COURT
 (9,603 SQ FT)

5035 BRANDIN COURT
 (15,000 SQ FT)

PROTON TECHNOLOGY CORP.
 Sample Location Map
 May 1998
 DRAWING NOT TO SCALE

GENERATOR'S WASTE MATERIAL PROFILE SHEET (Continued)

K 91470
Waste Profile Sheet Code

G. OTHER HAZARDOUS CHARACTERISTICS

- Is this waste a listed solvent waste as defined by 40 CFR 261.31 (F001, F002, F003, F004, or F005)? Yes No
- Does this waste contain greater than 1000 ppm total halogenated organic compounds? Yes No
- Indicate if this waste is any of the following:

<input type="checkbox"/> RCRA Reactive	<input type="checkbox"/> Radioactive
<input type="checkbox"/> Water Reactive	<input type="checkbox"/> Etiological
<input type="checkbox"/> Explosive	<input type="checkbox"/> Pesticide Manufacturing Waste
<input type="checkbox"/> Shock Sensitive	<input type="checkbox"/> Other _____
<input type="checkbox"/> Pyrophoric	<input checked="" type="checkbox"/> None of the above

H. COMPLETE ONLY FOR WASTES INTENDED FOR FUELS or INCINERATION

	LESS THAN	or	ACTUAL	
Beryllium	<input type="checkbox"/> < 5000 ppm		_____ ppm	
Potassium	<input type="checkbox"/> < 5000 ppm		_____ ppm	
Sodium	<input type="checkbox"/> < 5000 ppm		_____ ppm	
Total Bromine	<input type="checkbox"/> < 2 %		_____ %	
Total Chlorine	<input type="checkbox"/> < 35 %		_____ %	
Total Fluorine	<input type="checkbox"/> < 1 %		_____ %	
Total Sulfur			_____ %	

I. OPTIONAL — RECLAMATION, FUELS, OR INCINERATION PARAMETERS Provide if information is available.

- Range
- Heat Value (BTU/lb): _____
 - Water: _____ %
 - Viscosity (cps): _____ @ _____ °F 100°F 150°F
 - Ash: _____ %
 - Settleable solids: _____ %
 - Vapor Pressure @ STP (mm/Hg): _____
 - Is this waste a pumpable liquid? Yes No
Type of pump? _____
 - Can this waste be heated to improve flow? Yes No
 - Is this waste soluble in water? Yes No
 - Particle size: Will the solid portion of this waste pass through a 1/8 inch screen? Yes No

J. TRANSPORTATION INFORMATION

- Is this a DOT Hazardous Material? Yes No
- Anticipated Annual Volume/Units: 10 / CY
- Proper Shipping Name: HAZARDOUS WASTE SOLID, X.I.D.S.
- Hazard Class: 9
- I.D. #: NA 3077
- Additional Description: (_____)
- Method of Shipment: Bulk Liquid Bulk Solid Drum (Type/Size): _____ Other: _____
- CERCLA Reportable Quantity (RQ): _____
- RQ Units (lb/kg): _____
- USEPA Hazardous Waste? Yes No
- USEPA Hazardous Waste Number(s): 3008
- State Hazardous Waste? Yes No
- State Hazardous Waste Number(s): 181

K. SPECIAL HANDLING INFORMATION

Additional Page(s) Attached

L. GENERATOR CERTIFICATION I hereby certify that all information submitted in this and all attached documents contains true and accurate descriptions of this waste material, and all relevant information regarding known or suspected hazards in the possession of the generator has been disclosed.

1. X Byron Brill Signature
 2. LANDLORD'S PROPERTY Mgr. Title
 3. X BYRON BRILL (FOR PROTON TECHNOLOGY CORP.) Name (Type or Print)
 4. 3-29-98 Date



FROM: CUSTOMER SERVICE CENTER
WASTE MANAGEMENT, INC. - KHF
PO BOX 471
KETTLEMAN CITY, CA 93239
PHONE: (209) 386-9711

KHF SUBPART CC QUESTIONNAIRE

GENERATOR PROTRON TECH. RCRA CODE(S) DD08

PROFILE NO K91470 PROCESS: STABILIZATION
 MICROENCAPSULATION

Please answer questions 1 and 2 below. Sign and fax the signed questionnaire back to us at (209) 386-8109 or (209) 386-6207, Attention: Penny Wilson

(1) Does your waste stream contain underlying hazardous constituents exceeding the Universal Treatment Standards (UTS)? (RE: 40 CFR 268.48 UTS Table) See attached CWM-2004 F039/Underlying Hazardous Constituents (UTS) form.

NO

YES If yes, please mark an "X" next to the applicable constituents on the CWM-2004 UTS Form, indicate concentration.
 constituents are organics
 constituents are inorganics

(2) Does your waste stream exceed total volatile organics of 500 ppm? Provide available analysis (if any).

NO

YES

Your Customer Service Representative will contact you if there is any change in waste disposition and pricing information. Thank you for your time and effort in this matter.

B. W. Brill
SIGNATURE

3/30/98
DATE

BRANDON W. BRILL
PRINTED NAME/TITLE
PROPERTY MANAGER,
FREESTONE PROPERTIES, INC.
FOR PROPERTY OWNER,
BRANDON COURT T.I.C. FOR
PROTRON, TECHNOLOGY, INC.
TENANT AND WASTE GENERATOR

PROTRON TECHNOLOGY, INC.
COMPANY NAME

Protron

Technology Corporation

5045 Brandin Court, Fremont, California 94538-3140 Tel: (510) 226-9177 Fax: (510) 226-9179

FAX COVER SHEET

Friday, December 20, 1996

TO: COMPANY: CENTRAL PERMIT CENTER

ATTN: Mr. Paul Giardina

FAX: 510-286-6995

FROM: DOUGLAS HUNG
PRESIDENT

copy

THIS PAGE IS PAGE: 1 OF 1

COMMENTS:

We are in the business of Electronic Contract Manufacturing (Printed Circuit Boards Assembly). Do we need to have the following permits? If we do, how should we proceed?

- 1). EPA Stormwater Discharge Permit
- 2). Permits from Bay Area Air Quality Management District
- 3). Union Sanitary District Requirement Permit
- 4). Hazardous Waste Permit from local administering agency

Currently we have:

- 1). Hazardous Materials Permit by City of Fremont
- 2). EPA ID# CAL 000114779

Is there any other permit we should also looking into? Your service was referred to us by Mary Ortendahl of EDAB. We are very impressed by your consolidated efforts to help the business community in Alameda County. We hope to hear from you soon. Thank you again.



5045 Brandin Ct.
Fremont, CA, 94538
Tel: (510)226-9177
Fax: (510)226-9179

January 20, 1997

Mr. Don VanBuren
BAAQMD
939 Ellis St.
San Francisco, CA 94109

Dear Mr. VanBuren,

Thank you for your kind assistance and guidance over telephone the other day. As I have mentioned in our telephone conversation we are an electronic contract manufacturer. We like to know if we are required to apply a permit or permits from BAAQMD.

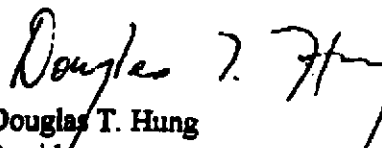
Followings are the daily usage of flux and thinner each machine (total 2 machines):
2331-ZX ORGANIC FLUX 3.2 lb.
4662 THINNER 4.7 lb.

For touch up and rework yearly use:
ISOPROPYL ALCOHOL 5-7 gallons

Conformal Coating on P C Boards 5 aerosol spray cans in 1996

Attached are 3 different copies of Material Safety Data Sheet for the above chemicals.

Best regards,


Douglas T. Hung
President



BAY AREA AIR QUALITY MANAGEMENT DISTRICT

January 24, 1997

ALAMEDA COUNTY
Edward R. Campbell
(Chairperson)
Greg Harper
(Secretary)
Mary King
Ben C. Tarrow

CONTRA COSTA COUNTY
Gayle Bishop
Paul L. Cooper
Mark DeSantis

MARIN COUNTY
Harold C. Brown, Jr.

NAPA COUNTY
Paul Battisti

SAN FRANCISCO COUNTY
Susan Laal
Mabel Teng

SAN MATEO COUNTY
Jerry Hill
Michael O. Navin

SANTA CLARA COUNTY
Randy Atwey
James T. Beal, Jr.
Tride Johnson
Gillen Moran

SOLANO COUNTY
William Carroll

SONOMA COUNTY
Jim Harberson
(Vice Chairperson)
Patricia Milliposs

Ellen Garvey
Air Pollution Control Officer

Protron Technology Corporation
5045 Brandin Court
Fremont, CA 94538

Attention: Douglas T. Hung, President

Dear Mr. Hung:

We have reviewed your letter of January 20, 1997, to determine if an Authority to Construct and/or Permit to Operate is required for the following equipment and operations:

Two wave soldering machines
Wipe cleaning operation
Application of conformal coating on assembled PC boards

We have determined that the equipment and operations are currently exempt from permitting as follows:

The two wave soldering machines appear to be exempt from permit requirements. (Rule 2-1 is enclosed for your information.) The BAAQMD actually looks at *each* wave solder machine as potentially three sources (flux applicator, solder bath and finger cleaner) subject to permits. In your letter, you indicate the daily usage of flux and thinner are 4.7 lbs and 3.2 lbs, respectively. Since the flux is 75% by weight solvent, usage of flux and flux thinner results in daily VOC emissions of nearly 7 lbs total for *two* machines. The conditional exemption in Section 2-1-106 currently allows up to 10 lbs of VOC emissions per highest day *per* source. The BAAQMD does not currently require a permit for the solder bath since that operation is conditionally exempt per Section 2-1-128.11. Finger cleaning with an organic solvent would require a permit. However, as we discussed over the phone, your wave soldering machines do not use TCA for finger cleaning since a water soluble flux is used.

The wipe cleaning operation is currently conditionally exempt from permit requirements by Section 2-1-118.9 since the solvent usage for wipe cleaning, on a facility-wide basis, is less than 20 gallons per year.

The application of a conformal coating to assembled PC boards is currently conditionally exempt for permit requirements by Section 2-1-119.3 since you use only non-refillable hand held aerosol cans.




Douglas T. Hung, President
Protron Technology Corporation
January 24, 1997
Page 2

These exemptions apply solely to permits. Other permit exemptions may apply as well. The equipment must be operated in compliance with any applicable District regulations and with other regulatory agency requirements. (The use of flux must comply with Rule 8-4. Wipe cleaning must comply with Rule 8-16. Aerosol spray cans must comply with Rule 8-49. Other general rules apply including Regulation 6 for visible emissions. Copies of Rules 8-4, 8-16 and 8-49 are enclosed for your information and action.)

Note that these exemptions are not permanent. Any change in your operation or in District regulations may require you to obtain permits in the future. In the event you require a permit from the District, that operation will also be subject to Rule 2-2, New Source Review.

Please retain this letter as a record of your current exempt status. If you have any questions, please call the undersigned at (415) 749-4746 on Monday, Tuesday or Thursday or (408) 277-1477 on Wednesday or Friday.

Very truly yours,


Donald P. Van Buren, P.E.,
Air Quality Engineer II

DVB:dvb

cc: John Joseph, BAAQMD Permit Coordinator
BAAQMD Exemption File

**Greater Oakland
Permit Assistance Center**

1330 Broadway
Second Floor
Oakland CA 94612
(510)286-6989

February 7, 1997

Douglas T. Hung, President
Protron Technology Corporation
5045 Brandin Court
Fremont CA 94538-3140

RE: Required Permits from Environmental Compliance Agencies

Dear Mr. Hung:

I am responding to your request for information on permits from local, regional and state agencies for your printed circuit board assembly business. I understand that you have received a response from the Bay Area Air Quality Management District. Below I have summarized information relative to other agencies' requirements:

1) **Stormwater Discharge Permit:** Printed circuit board assemblers are not required to operate under a permit from the State Water Resources Control Board unless they store materials or carry out processes that are potential sources of pollutants **OUTSIDE** their buildings. You have said that Protron has no such outside operations. Ideally, you should walk your facility to ensure that no pollution sources exist that could impact stormwater run off and make a written record of the inspection and findings. 916-657-0919 ✓

2) **Sanitary Discharge Permit:** A business such as yours is not required to operate under a permit from the local sanitary district (Union Sanitary District). However, your facility would be subject to inspection by the District and you might be required to prepare a discharge report by that Office. Union Sanitary District can be reached at (510)790-0100.

3) **Hazardous Waste Generator Permit:** Hazardous waste generators are not required to operate under a permit from the Alameda County Environmental Protection Division. This is the local agency that currently inspects hazardous waste generators. This Office does require hazardous waste generators to pay fees. In the next few months, hazardous waste inspection authority will be transferred to the City of Fremont's Hazardous Materials Program within the Fire Department, which currently regulated hazardous materials storage. At that time, the City will issue a combined hazardous materials and hazardous waste permit and will charge a combined, single fee.

Thank you for calling the Permit Assistance Center. You may contact me there at (510)286-7156 with any further questions or comments.

Sincerely,



Pamela J. Evans
Senior Hazardous Materials Specialist