



American
Xtal
Technology

ENVIRONMENTAL
PROTECTION
96 OCT -2 PM 3:49

VGf Excellence

September 30, 1996

Ms. Madulla Logan
Hazardous Materials Specialist
Alameda County Environmental Protection Agency
1131 Harbor Bay Pkwy., Ste. 250
Alameda, CA 94502-6577

**Re: REQUEST FOR FINAL SITE CLOSURE FOR 6785D SIERRA COURT,
DUBLIN.**

Dear Ms. Logan:

On July 17, 1996, a formal closure plan was submitted to you for review and comments. On August 2nd, a check for \$1,000 was submitted to Alameda County for oversight fees. On August 7th, We met at the above mentioned site and you verbally approved the closure plan submitted on July 17th.

Demolition of all tenant improvements began the second week of August. All non-hazardous waste was removed before any hazardous waste was removed. The majority of the hazardous waste was non-RCRA. This hazardous waste was placed into a storage bin and disposed of at Waste Management's class 2 Landfill at the Altamont Landfill in Livermore (Appendix 1). The RCRA hazardous waste was disposed of at Chemical Waste Management's class 1 landfill at Kettleman City, California (Appendix 2).

All vinyl color tile (VCT) was disposed of as non-RCRA hazardous waste. Vinyl color tile mastic was removed from the concrete slab by use of a floor sander. Further floor stripping was performed by using a chemical adhesive remover. After all VCT mastic was removed, the slab was tested for arsenic with a Merck Arsenic colorimetric test kit. The test kit detected small amounts of arsenic on the surface of the slab (1-2 ppm) predominately by the roll up door. The slab was then cleaned with a compound of ammonium hydroxide, hydrogen peroxide and water. This solution changes any toxic arsenic on the surface to non-toxic sodium arsenite. Unfortunately, the solution also etched the surface of the slab pushing sodium arsenite just below the surface. Only one-third of the slab was etched with that caustic solution. Once I realized the concrete was being etched by that caustic solution, I discontinued using that compound.

To remove any remaining arsenic compounds from the surface of the slab, I employed Concord Sandblasting to remove the surface of the slab by using a system called "Blast Track." This machine uses metal shot to remove concrete. The metal shot is recycled and the concrete dust is drawn into a holding bin by vacuum. "Blast Track" is similar to sand



blasting but is self-contained to prevent dust from contaminating surround surfaces. All dust and waste filters were disposed of as hazardous waste.

Following the "Blast Track" the slab was washed with soap and water. On 9/6/96, I observed Mr. Lee Kurtzweil, consultant for RReef Properties, take six wipe samples from the slab surface. I submitted four of the six samples (#6785-01 thru #6785-04) to Clayton Environmental for analysis. ~~Samples #01 and #03 were prepared with HCL and samples #02 and #04 were prepared using de-ionized (D.I.) water.~~ Mr. Kurtzweil submitted a total of ~~four~~ ^{two} samples to McCampbell Analytical, Inc. ~~Of the four samples submitted by Mr. Kurtzweil, samples #1 and #3 were actual wipe samples from the slab and samples #2 and #4 were sample blanks.~~ All results from Clayton Environmental were non-detect (Appendix 3). *so 4 samples to clayton All ND.*

The results from the two samples analyzed by McCampbell Analytical were:

sample #1: 0.63mg/l (ppm)
sample #3: non-detect
samples #2 and #4 were blanks (Appendix 4). *2 samples to McCampbell*

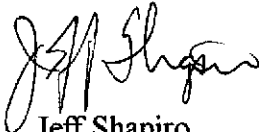
The reference used for remediation levels was the United States Environmental Protection Agency, Region IX Preliminary Remediation Goals (PRGs) 1996 (Appendix 5).

According to this document, permissible levels for arsenic compounds remaining in industrial soil are 2.2 mg./kg (ppm). The only detectable sample of arsenic compounds found on the slab was 0.63 ppm.

On September 13th, the area of the slab that had results of 0.63 mg./kg was washed with soap and water and re-tested for arsenic. The result of that test was non-detect (Appendix 6). On September 16th, AXT applied two (2) coats of concrete sealant to the slab making it impervious to water.

With all final sample results non-detect and the surface of the slab completely sealed, I am requesting final closure of the above mentioned site. If you have any questions, concerning this site, please contact me at (510) 683-5900 x127.

Sincerely,



Jeff Shapiro
Safety and Regulatory Manager

C: Sheri Dunn, RReef Property Management
Bob White, City of Dublin Building Department
Russ Fulwood, Dougherty Fire Authority
Fernando Lomas, Dublin San Ramon Service District

All 4 samples to clayton are real wipe samples

September 12, 1996

Ms. Madulla Logan
Hazardous Materials Specialist
Alameda County Environmental Protection Agency
1131 Harbor Bay Parkway, Ste. 250
Alameda, CA 94502-6577

Re: SITE CLOSURE OF 6785D SIERRA COURT, DUBLIN.

Dear Ms. Logan:

Per our conversation on September 11, 1996, American Xtal Technology (AXT) along with RReef Management's (Property owner for the above mentioned site) environmental consultant, ATC Environmental, Inc.; took a total of six wipe samples from the slab at the above mentioned site. All samples were tested for arsenic under STLC. Of the six samples tested, five were non-detect and one was 0.63 mg./l. At the request of ATC Environmental, AXT will de-con that area again and ATC will perform another wipe test. After that wipe test, AXT will contract to seal the surface of the slab. A final request for closure will be sent to you within 30 days. If you have any further questions, please contact me at (510) 683-5900.

Sincerely,



Jeff Shapiro
Safety and Regulatory Manager

C: Sheri Dunn, RReef Management



Certificate No. 95/6271

State of California Environmental Protection Agency
Form Approved OMB No. 2050-0019 (Expires 9-30-96)
Please print or type. Form designed for use on an 8 1/2 (12 pitch) typewriter.

Department of Toxic Substances Control
Sacramento, California

96175711
IN CASE OF EMERGENCY OR SPILL, CALL THE NATIONAL RESPONSE CENTER 1-800-424-8802; WITHIN CALIFORNIA, CALL 1-800-852-7550

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. C A D 9 8 3 5 9 5 9 7 6 7 5 7 1 1		Manifest Document No.		2. Page 1 of 1		Information in the shaded areas is not required by Federal law					
3. Generator's Name and Site Address American X-TAL Technology 6780 Sierra Court, Suite I Dublin CA 94568				Site Address same		A. State Manifest Document Number 96175711							
4. Generator's Phone (510) 833-0553				6. US EPA ID Number C A D 0 0 0 6 0 3 7 3 8		B. State Generator's ID H A 0 3 6 - 0 2 9 1 9 2							
5. Transporter 1 Company Name North State Environmental				8. US EPA ID Number		C. State Transporter's ID 7 2 3 9							
7. Transporter 2 Company Name				10. US EPA ID Number		D. Transporter's Phone (415) 888-2838							
9. Designated Facility Name and Site Address Chemical Waste Management, Inc. 35251 Old Skyline Road Kettleman City CA 93239				10. US EPA ID Number C A T 0 0 0 6 4 6 1 1 7		E. State Transporter's ID							
						F. Transporter's Phone							
						G. State Facility ID C A T 0 0 0 6 4 6 1 1 7							
						H. Facility's Phone (800) 222-2584							
11. US DOT Description (including Proper Shipping Name, Hazard Class, and ID Number) "Drywall, Non-RCRA Hazardous Waste Solid					12. Containers No. Type		13. Total Quantity		14. Unit Wt/Vol		15. Waste Number		
					1 BA		600		P		State 55E / 1		
											EPA/Other RCRA		
											State		
											EPA/Other		
											State		
											EPA/Other		
16. Additional Descriptions for Materials Listed Above a. 803813 100% drywall					K. Handling Codes for Waste Listed Above								
					a.		b.		c.		d.		
13. Special Handling Instructions and Additional Information Jeff Shapiro (510) 833-0553 8-6 M-F (510) 373-6025 other Trans 1 address: 90 S. Spruce Ave., South San Francisco, CA 94080 Trans 2 address:					Emergency Contact:						a: 2A b: c: d:		
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 H. CHANG				Signature H. Chang				Month 09		Day 05		Year 96	
17. Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name L. Conway				Signature L. Conway				Month 09		Day 05		Year 96	
18. Transporter 2 Acknowledgement of Receipt of Materials Printed/Typed Name H. CHANG				Signature H. C.				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.
Mr. Rippe
has provided
part of
Alebrin
that had
been
gone

NORTH STATE ENVIRONMENTAL

APPENDIX 1

Remit To:
 North State Environmental
 P.O. Box 5624
 So. San Francisco, CA 94083-5624
 (415) 588-2838

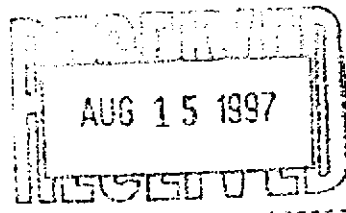
Invoice

Invoice No. 008194
 Inv.Date 08/14/96
 PO.NO. Jeff Shapiro

Accounts Payable
 American X-Tal Technology
 6780 Sierra Court-Suite 1
 Dublin CA 94568

Jobdate	Jobnum	Service	Item	Number	Unitpric	Linepric
08/12/96	74921	supplies	Bin Liner	1.00	50.00	50.00
08/12/96	74921	supplytax	Sales Tax	1.00	4.13	4.13
TOTAL						54.13

*Linen -
 Non-PP Plastic Liner
 that fits into
 crumbly can use
 where the debris
 is put in
 Debris - from walls &
 floor*



NORTH STATE ENVIRONMENTAL
P. O. Box 5824
South San Francisco, CA 94083-5824

74921

CUSTOMER'S ORDER NO.	DEPARTMENT	DATE	
NAME		8/12/96	
ADDRESS			
CITY, STATE, ZIP			
SOLD BY	CASH	COD	
CHARGE	CREDIT	PAID	
QUAN	DESCRIPTION	PRICE	AMOUNT
1	1 BAN LWR		
2			
3			
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9			
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14			
15			
16			
17			
18			
19			
20			
RECEIVED BY			

From item with value

KEEP THIS SLIP FOR REFERENCE

NORTH STATE ENVIRONMENTAL

Remit To:
North State Environmental
P.O. Box 5624
So. San Francisco, CA 94083-5624
(415) 588-2838

Invoice

Invoice No. 008262
Inv.Date 08/28/96
PO.NO. Jeff Shapiro

Accounts Payable
American X-Tal Technology
6780 Sierra Court-Suite 1
Dublin CA 94568

Jobdate	Jobnum	Service	Item	Number	Unitpric	Linepric
3/26/96	74922	other	Transportation	1.00	250.00	250.00
3/26/96	74922	other	Disposal, 12 Yards	12.00	65.00	780.00
TOTAL						1030.00

*Debris cost
of transportation*

RECEIVED
AUG 30 1996
ISSUES

Accounts due and payable 30 days from date of invoice. All past due amounts
will bear interest at 1.5% per month.

74922

NORTH STATE ENVIRONMENTAL

P. O. Box 5624

South San Francisco, CA 94093-5624

CUSTOMER'S ORDER NO.	DEPARTMENT	DATE 8/26/96
NAME AMERICAN F TAL		
ADDRESS 6785 SIERRA CT		
CITY, STATE, ZIP Dubuque		

PAID BY	CASH	C.O.D.	CHARGE	ON ACCT	MDSE RETD	PAI
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QUAN.	DESCRIPTION	PRICE	AMOUNT
1			APA 124
2			
3			
4			
5			
6	8/26/96		
7			
8	PICKED UP ONE BANK B-13		
9	TO: ALTAMONT LANDfill		
10			
11			
12			
13			
14			
15			
16			
17			
18			
19			
20			

John Long

RECEIVED BY: _____

KEEP THIS SLIP FOR REFERENCE

Receipt for Altamont

ALTAMONT LANDFILL & RRF

DATE: 04/26/96 TICKET: 9041 - 1

AC 47

TIME OUT: 10:05 E/O: I

SCALE TICKET: 10443

CARRIER: NORT NORTH STATE ENVIRONMENTAL
 TRUCK#: 20 ROLLER TRAILER
 CUSTOMER: NSE NORTH STATE ENVIRONMENTAL
 GENERATOR: AXT AMERICAN THERMAL TECHNOLOGIES
 ORIGIN: DUBLI DUBLIN

MANIFEST	WASTE DESCRIPTION	QUAN.	UNIT	WEIGHT	PERCENTAGE	TOTAL
	620 CLASS II D	12.00	TONS			

GROSS: 43120 PB LBS
 TARE: 39760 PB LBS
 NET: 3360 LBS TONS:

CUSTOMER: *[Signature]*
 WEIGHMASTER: *[Signature]*

WEIGH IN CLERK: BROWN, KEN JR

WEIGH OUT CLERK: BROWN, KEN JR

THIS IS TO CERTIFY THAT THE FOLLOWING DESCRIBED COMMODITY WAS WEIGHED, MEASURED, OR COUNTED BY A WEIGHMASTER WHOSE SIGNATURE IS ON THIS CERTIFICATE, WHO IS A RECOGNIZED AUTHORITY OF ACCURACY, AS PRESCRIBED BY CHAPTER 7 COMMENCING WITH SECTION 127001 OF DIVISION 5 OF THE CALIFORNIA BUSINESS AND PROFESSIONS CODE ADMINISTERED BY THE DIVISION OF MEASUREMENT STANDARDS OF THE CALIFORNIA DEPARTMENT OF FOOD AND AGRICULTURE.