

ALAMEDA COUNTY
HEALTH CARE SERVICES

AGENCY
DAVID J. KEARS, Agency Director



Remedial Action Completion Certification

ENVIRONMENTAL HEALTH SERVICES
ENVIRONMENTAL PROTECTION (LOP)
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November 10, 1997

Ed Haggerty
American Xtal Technology
4311 Solar Way,
Fremont, CA - 94538

Ref: American Xtal Technology - 6780 Sierra Court, Dublin, CA

Dear Mr. Haggerty:

I am in receipt of the report "*Completion of Remedial Action Plan*", dated August 7, 1997, "*Results of Wipe Samples Collected on October 14, 1997*", dated October 16, 1997 and "*Plan for Final Cleaning of Floors and Walls*" dated October 30, 1997 and "*Results of Wipe Samples Following Final Cleaning*", dated November 10, 1997 prepared by American Xtal Technology (AXTAL) for the above referenced site. This Department has reviewed all the pertinent documents as part of closure evaluation.

AXTAL manufactured polycrystalline gallium arsenide wafers which is a suspected human carcinogen. As part of the required process in closing the facility, AXTAL contracted with Synergy Environmental to remove process related equipment piping etc., and tenant improvements, clean the space by HEPA vacuuming to remove traces of gallium arsenide and dispose waste generated from their plant operation. Wipe samples were collected prior to cleaning from the floors of the warehouse, treatment/process, office, lunch room and rest room areas. The concentrations of arsenic varied from $7\mu\text{g}/100\text{cm}^2$ to $1000\mu\text{g}/100\text{cm}^2$, with the highest concentrations observed in the back of the warehouse and the manufacturing areas. Following cleaning activities, confirmatory wipe samples were collected from the floor areas on July 31, 1997. The concentrations of arsenic had decreased and ranged from $3\mu\text{g}/100\text{cm}^2$ to $18\mu\text{g}/100\text{cm}^2$

No wipe samples were collected from the walls although areas of stained sheet rock in the warehouse area were removed and replaced. Hence, this Department requested that additional wipe samples be collected from the walls. On October 14, 1997, samples were collected from the lunch room, rest room, office and warehouse areas. One wipe sample collected from the wall in the warehouse indicated $25\mu\text{g}/100\text{cm}^2$. This Department requested that an additional workplan be submitted to clean the trace amounts of arsenic found in the floor areas and in the walls of the warehouse area.

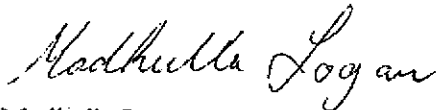
On October 30, 1997, AXTAL re-cleaned the floors of the production and warehouse areas and the walls of the warehouse area from 4 to 8 feet (since the walls were replaced with new sheetrock up to 4 feet) with HEPA vacuuming and subsequent to cleaning, the walls were painted and the floors encapsulated. On November 4, 1997, nine confirmatory wipe samples were collected from the

cleaned surfaces.

Based on the remediation performed and the results of the confirmatory wipe samples, site closure and demolition activities have been completed satisfactorily and the site does not pose a threat to public health. However, this Department recommends that appropriate risk management practices, like painting the walls, inspection and maintenance of the floors, air monitoring etc., be done in a consistent manner. This can only add to the safety of the future employees at the referenced site.

If you have any questions, you may reach me at (510) 567-6764.

Sincerely,

A handwritten signature in cursive script that reads "Madhulla Logan".

Madhulla Logan
Hazardous Material Specialist

C: *Mike Furray*, CB Commercial, 201 North Civic Drive, Suite 240, Walnut Creek, CA -94596
Sam Genirberg, B/G Management CO. 2520 College Avenue, Berkeley, CA - 94704.