American Xtal Technology

VGF Excellence

Samples collected 11/7/97

November 10, 1997

Via Fax

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

Re: Results of Wiping Sampling at 6780 Sierra Court, Suite I, Dublin, CA following Final Cleaning

Dear Ms. Logan:

Following the execution of the Final Cleaning Plan, which was outlined in a letter to you dated October 30, 1997, American Xtal Technology collected wipe samples in nine (9) locations of the production/warehouse area of Suite I. The purpose was to provide appropriate documentation concerning the outcome of the work performed. Samples were collected on Whatman 42 filters moistened with deionized water over 100 square centimeters of surface area. Samples were analyzed via OSHA Method ID121M. Access to the site was provided by Mr. Mike Furay of CB Commercial.

Testing showed non-detectable results (<3 ug/100 square centimeters of inorganic arsenic) for seven of nine samples collected. Two of nine samples showed detectable results, but these were found to be just above the limit of detection for the testing method employed. These results are presented below:

	Sample Description/Location	Result (ug/100 sq. cm.)	
1.	Warehouse Demising Wall Approximately 5' above floor	<3	(none detected)
2.	Warehouse Floor About 15' North of Demising Wall	4	
3.	Production Floor Just North of Office Entry	<3	(none detected)
4.	Production Floor Near Front Lobby	<3	(none detected)
5.	Floor Near Front Restroom	<3	(none detected)

Nov 4, 1997

4311 Solar Way, Fremont CA 94538 Tel (510) 683-5900 Fax (510) 683-5901

ISO 9002 Certificate No. 95/6271

	Sample Description/Location	Result (ug/100 sq. cm.)	
6.	Warehouse Floor Center Line Near Fire Hose	<3	(none detected)
7.	Warehouse Floor Opposite Rear Restroom	<3	(none detected)
8.	Rear Office Floor @ Jam	5	
9.	Production Floor Near Transformer	<3	(none detected)

Should you have questions, please do not hesitate to contact us.

Respectfully submitted,

American Xtal Technology

Edward J. Haggerty, CIH
Manager of EH&S

Attachments: Location Map
Laboratory Results
"Request for Analytical Services"

cc: Mr. Sam Genirberg
B/G Management
2520 College Avenue
Berkeley, CA 94704
Tel. 510-848-3608
Fax 510-848-3618

Clayton ENVIRONMENTAL CONSULTANTS

Analytical Results
for
American Xtal Technology
Client Reference: DUBLIN FINAL
Clayton Project No. 97110.21

Sample Identification: See Below
Lab Number: 9711021
Sample Matrix/Media: WIPE
Digestion Method: OSHA ID121M
Method Reference: OSHA ID121M

Date Received: 11/04/97
Date Digested: 11/04/97
Date Analyzed: 11/05/97

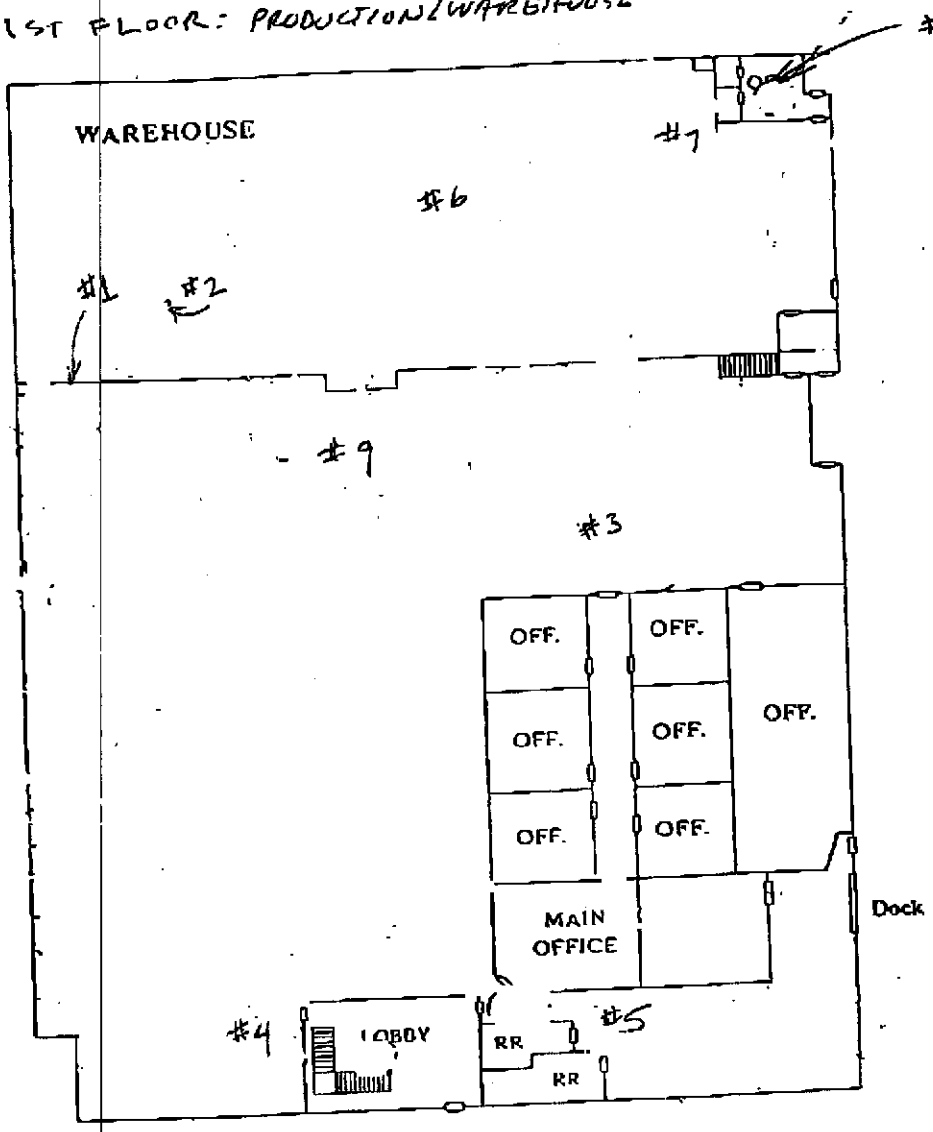
Lab Number	Sample Identification	Date Sampled	Arsenic (mg/wipe)	Method Detection Limit (mg/wipe)
-01	#1	11/04/97	<0.003	0.003
-02	#2	11/04/97	0.004	0.003
-03	#3	11/04/97	<0.003	0.003
-04	#4	11/04/97	<0.003	0.003
-05	#5	11/04/97	<0.003	0.003
-06	#6	11/04/97	<0.003	0.003
-07	#7	11/04/97	<0.003	0.003
-08	#8	11/04/97	0.005	0.003
-09	#9	11/04/97	<0.003	0.003
-10	METHOD BLANK	--	<0.003	0.003

ND: Not detected at or above limit of detection
--: Information not available or not applicable

11-30-2006

LOCATION NOS.: WIPE SAMPLE DATA

1ST FLOOR: PRODUCTION/WAREHOUSE



6780 SIERRA COURT
DUBLIN, CALIFORNIA 94568

Scale in Feet
0 20

SAMPLES COLLECTED ON 11/4/97

Clayton ENVIRONMENTAL CONSULTANTS

REQUEST FOR LABORATORY ANALYTICAL SERVICES

Dublin Final

IMPORTANT
Date Results Requested: Std TAT
Rush Charges Authorized? ☐ Yes ☐ No
☐ Phone or ☐ Fax Results

For Clayton Use Only
Clayton Lab Project No.
9711021

REPORT TO: (PRINT)		SEND INVOICE TO:
Name: AXT E. Haggerty	Client Job No.:	Purchase Order No.
Company: AXT	Dept.	Name
Mailing Address: 4311 SOLAR WAY		Company / Dept.
City, State, Zip: FREMONT		Address
Telephone No.: 683-5900 x127 FAX No.: 683-5901		City, State, Zip

Special instructions and/or specific regulatory requirements: (method, limit of detection, etc.)
100 cm² wipe samples on whatman 42 filters
50% RUSH (PACO) per Hawa

* Explanation of Preservative: Charge

Samples are: (check if applicable)
☐ Drinking Water
☐ Groundwater
☐ Wastewater

ANALYSIS REQUESTED
(Enter an 'X' in the box below to indicate request; Enter a 'P' if Preservative added.*)

	CLIENT SAMPLE IDENTIFICATION	DATE SAMPLED	TIME SAMPLED	MATRIX/ MEDIA	AIR VOLUME (specify units)	Number of Containers	Arsenic	FOR LAB USE ONLY	
#1	warehouse demising wall	11/4		42	MA	1		01	* TAT
#2	warehouse floor near demising wall	11/4		Whatman				02	*
#3	production floor near offices	11/4						03	*
#4	production floor near lobby	11/4						04	* * Todd
#5	floor near front restroom	11/4						05	
#6	warehouse floor near fire hose	11/4						06	
#7	warehouse floor opposite restroom	11/4						07	
#8	rear office floor by door	11/4						08	
#9	production floor near transformer	11/4						09	

CHAIN OF CUSTODY

Collected by: E. Haggerty (print) — Collector's Signature:
Relinquished by: E. Haggerty — Date/Time 11/4 1410 — Received by: — Date/Time
Relinquished by: — Date/Time — Received by: — Date/Time
Method of Shipment: — Received at Lab by: Cheryl Allen — Date/Time 11/4/97
Authorized by: E. Haggerty (Client Signature MUST Accompany Request) Date — Sample Condition Upon Receipt: ☐ Acceptable ☐ Other (explain) 2:15

Please return completed form and samples to one of the Clayton Environmental Consultants, Inc. labs listed below:

Detroit Regional Lab
22945 Roethel Drive
Novi, MI 48375
(800) 806-5687
(248) 344-1770
FAX (248) 344-2655

Atlanta Regional Lab
400 Chastain Center Blvd., N.W., Suite 460
Kennesaw, GA 30144
(800) 252-9919
(770) 499-7500
FAX (770) 423-4990

San Francisco Regional Lab
1252 Quarry Lane
Pleasanton, CA 94566
(800) 284-1755
(510) 426-2667
FAX (510) 426-0106

Seattle Regional Lab
4535 E. Marginal Way S., Suite 215
Seattle, WA 98134
(800) 566-7755
(206) 763-7354
FAX (206) 763-4189

DISTRIBUTION:
White = Clayton Laboratory
Yellow = Clayton Accounting
Pink = Client Copy

11/95 20K

American
Xtal
Technology

VGF Excellence

October 30, 1997

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

Re: Plan for Final Cleaning of Floors and Walls at 6780 Sierra Court, Suite I
Dublin, CA

Dear Ms. Logan:

To resolve outstanding issues with respect to clearance of 6780 Sierra Court, Suite I, on October 14, 1997, American Xtal Technology collected five wipe samples of wall surfaces in various areas of the facility and one wipe sample of a bare concrete floor in what was formerly AXT's waste treatment area. The purpose of sampling was to develop objective data as to the effectiveness of final construction cleaning of the work space, which had been completed earlier on July 31, 1997.

Results of these samples were submitted to the county and the building owner on October 16. The results showed that smooth, painted wall surfaces in various areas of the facility were free of detectable inorganic arsenic (<3 ug/100 sq. cm.) Results also showed that one unpainted wall in the warehouse, an area that had served at one time as a production area, had a detectable surficial trace of inorganic arsenic dust.

In follow-up to these findings, AXT contacted the county, the building owner, and the building owners representatives (Mr. Mike Furay of CB Commercial and Mr. Nels Johnson of SCS Engineers) and proposed the implementation of the following measures to achieve a final clearance of the space:

1. To address possible concern about traces levels of inorganic arsenic on unpainted surfaces of drywall in the warehouse, AXT will have Synergy Environmental re-clean all of these surfaces to a height of eight feet. The cleaning to be performed shall consist of HEPA vacuuming using a suitable brush attachment and/or "damp" wiping, as practicable. Subsequent to re-cleaning, Synergy will apply a suitable paint or primer to original unpainted drywall surfaces in the warehouse to prevent any potential for contact exposure or release of even residual trace metal from these surfaces.

2. To address possible concerns about trace levels of inorganic arsenic dust on floors, in the absence of established clearance criteria, American Xtal Technology will have Synergy Environmental, an experienced and certified asbestos and lead abatement company, re-clean concrete floors throughout the facility utilizing specialized "decontamination" work practices (i.e., HEPA vacuuming, and wet mopping). As an added measure of control, at the completion of cleaning, Synergy will apply a lock-down encapsulant or sealant to the floors.

3. American Xtal Technology believes that the implementation of these actions are sufficient to address the outstanding issues raised in earlier meetings and discussions with the county and the owner. American Xtal Technology is prepared to collect three wipe samples, in total, to provide objective data on the effectiveness of the re-cleaning and painting to be performed by Synergy Environmental. AXT proposes collection of wipe samples of concrete floors in two areas, to be selected at random by AXT, and one sample of newly painted drywall (at the approximate location of Sample 6 - collected on 10/14/97). We have advised the building owner, and/or his representative and consultant, that we believe they should submit objective data to the county concerning the public habitability of this space following AXT's vacancy. From conversations with Mr. Mike Furay earlier today, it is my understanding that SCS Engineers intends to do sampling within the space following our proposed work on behalf of the owner

Should you have questions, please do not hesitate to contact us.

Respectfully submitted,

American Xtal Technology

Edward J. Haggerty

Edward J. Haggerty, CIH
Manager of EH&S

cc: Mr. Sam Genirberg
B/G Management
2520 College Avenue
Berkeley, CA 94704
Tel. 510-848-3608

American
Xtal
Technology

VGF Excellence

October 16, 1997 **Via Fax**

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

Re: Results for Wipe Samples taken @ B/G Management, 6780 Sierra Court, Suite I, Dublin, CA on October 14, 1997

Dear Ms. Logan:

This letter summarizes the results of six wipe samples that were collected at the referenced property on Tuesday morning. Five were from wall surfaces; one was from the bare concrete floor. All wipes were taken over 100 square centimeters. The procedures used are duplicative of those previously employed. Results for five samples showed no detectable presence of inorganic arsenic (<3 ug). One did show a detectable presence. This was for a sample taken in the 'warehouse area', a former slicing production area. The results was equal to 25 ug/100 sq. cm. Results are summarized below:

	Sample Description	Result (ug/100 sq. cm.)
1.	2nd Floor Wall, Exterior or southside of lunch room, approx. 12' west of room entry, 5' height	<3 ug/100 sq. cm.
2.	2nd Floor Wall, Northwall, Hallway to Restrooms, 5' height	<3 ug/100 sq. cm.
3.	!st Floor Wall, Exterior or northside of Office Area, approx. 3' east of doorway, 5' height	<3 ug/100 sq. cm.
4.	1st Floor Exterior Wall, Near Old Waste Treat. Area, approx. 15' south of demising wall, 5' height	<3 ug/100 sq. cm.
5.	1st Floor, Concrete Floor, Center of Old Waste Treat. Area	<3 ug/100 sq. cm.
6.	1st Floor, Warehouse, SW Corner, Demising Wall, Approx. 10' east of west wall, 5' Height	25 ug/100 sq. cm.

For reference purposes, I have marked sample locations with X's on the accompanying floor plans. For documentation purposes, I have included copies of the laboratory's "Analytical Results" and chain-of -custody form ("Request for Analytical Services").

Respectfully submitted,

American Xtal Technology

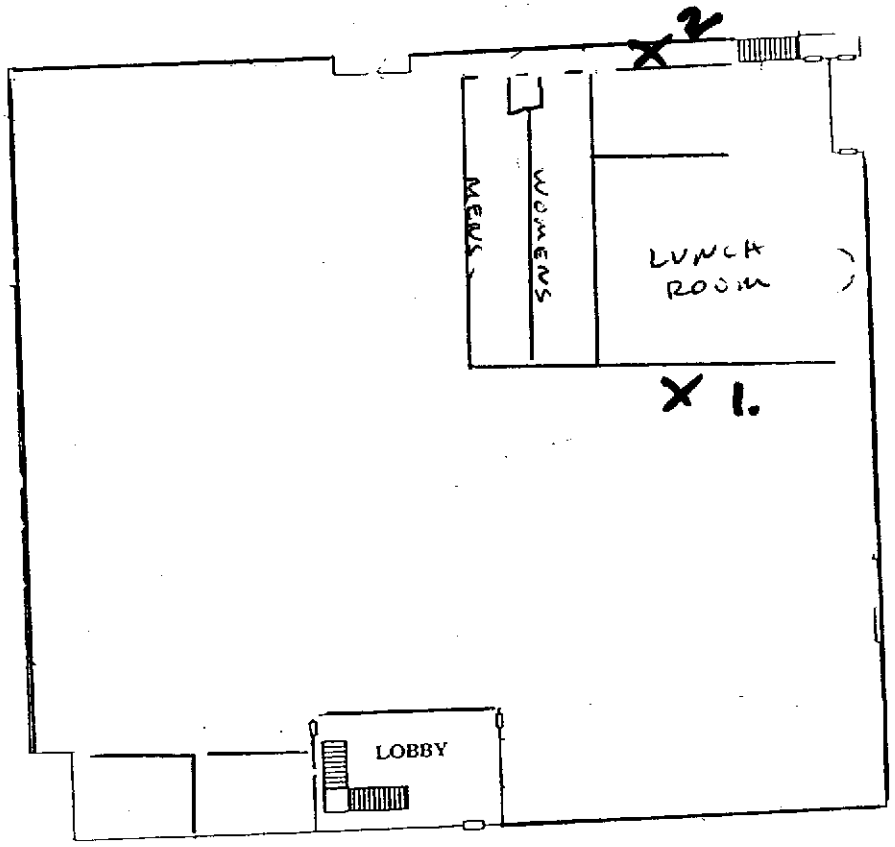
Edward J. Haggerty, CIH
Manager of EH&S

Enclosure

cc: Mr. Sam Genirberg
B/G Management
2520 College Avenue
Berkeley, CA 94704
Tel. 510-848-3608
Fax. 510-848-3618

LOCATION NOS. : WIPE SAMPLE DATA

2nd FLOOR : OFFICE



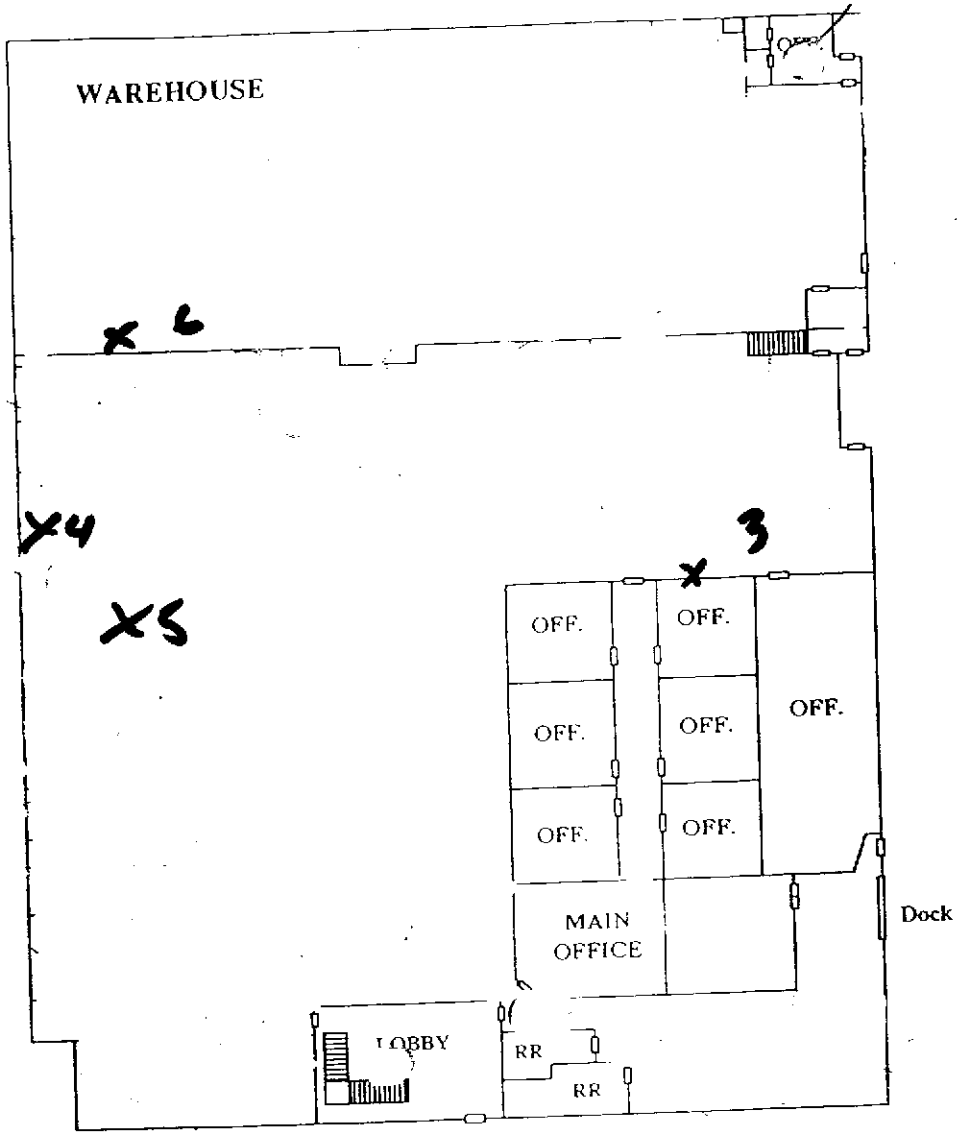
6780 SIERRA COURT
DUBLIN, CALIFORNIA 94568

N

Scale in Feet
0 20 40

LOCATION NOS.: Wipe SAMPLE DATA

1ST FLOOR: PRODUCTION/WAREHOUSE



6780 SIERRA COURT
DUBLIN, CALIFORNIA 94568

N

Scale in Feet
0 20 40

Clayton ENVIRONMENTAL CONSULTANTS

Analytical Results
for
American Xtal Technology
Client Reference: DUBLIN SITE
Clayton Project No. 97101.47

Sample Identification: See Below
Lab Number: 9710147
Sample Matrix/Media: WIPE
Digestion Method: OSHA ID121M
Method Reference: OSHA ID121M

Date Received: 10/14/97
Date Digested: 10/15/97
Date Analyzed: 10/15/97

Lab Number	Sample Identification	Date Sampled	Arsenic (mg/wipe)	Method Detection Limit (mg/wipe)
-01	001-2ND FLR	10/14/97	<0.003	0.003
-02	002-2ND FLR	10/14/97	<0.003	0.003
-03	003-1ST FLR	10/14/97	<0.003	0.003
-04	004-1ST FLR	10/14/97	<0.003	0.003
-05	005-1ST FLR	10/14/97	<0.003	0.003
-06	006-WAREHOUSE	10/14/97	0.025	0.003
-07	METHOD BLANK	--	<0.003	0.003

ND: Not detected at or above limit of detection
--: Information not available or not applicable

Clayton
ENVIRONMENTAL CONSULTANTS

REQUEST FOR LABORATORY ANALYTICAL SERVICES

RUSH
Date Results Requested:
Rush Charges Authorized? ☒ Yes ☐ No
☐ Phone or ☒ Fax Results

For Clayton Use Only
Clayton Lab Project No.
9710147

Name	Ed Hagerty	Client Job No.	Dublin Site
Company	AMERICAN X-RAY TECH.	Dept.	
Mailing Address	4311 SOLAR WAY		
City, State, Zip	FREMONT, CA 94538		
Telephone No.	510-683-5900	FAX No.	683-5901

Purchase Order No.	WILL CALL		
Name	SAME AS REP		
Company		Dept.	
Address			
City, State, Zip			

Special instructions and/or specific regulatory requirements:
(method, limit of detection, etc.)
100 cm² wipes whatman 42 filters
48hr Rush
* Explanation of Preservative:

Samples are:
(check if applicable)
☐ Drinking Water
☐ Groundwater
☐ Wastewater

ANALYSIS REQUESTED
(Enter an 'X' in the box below to indicate request; Enter a 'P' if Preservative added.*)

CLIENT SAMPLE IDENTIFICATION	DATE SAMPLED	TIME SAMPLED	MATRIX/ MEDIA	AIR VOLUME (specify units)	Number of Containers	arsenic	FOR LAB USE ONLY
001-2nd Flr wall exterior-lunch room	10/14		whatman	NA	1	X	01A
002-2nd Flr wall-hallway	→		42	NA	1		02
003-1st Flr wall-office area	→				1		03
004-1st Flr wall-near W.T.	→				1		04
005-1st Flr floor-W.T.	→				1		05
006-warehouse demise wall	→		↓	↓	1	↓	06

CHAIN OF CUSTODY

Collected by: Ed Hagerty (print) Collector's Signature:
Relinquished by: Ed Hagerty Date/Time 10/14 11:45
Relinquished by: Ed Hagerty Date/Time 10/14 11:45
Method of Shipment: Hand
Authorized by: Ed Hagerty Date 10/14
(Client Signature MUST Accompany Request)

Received by: Date/Time
Received by: Date/Time
Received at Lab by: Carol Hammerberg Date/Time 10/15/97 11:45
Sample Condition Upon Receipt: ☒ Acceptable ☐ Other (explain)

Please return completed form and samples to one of the Clayton Environmental Consultants, Inc. labs listed below:

Detroit Regional Lab
22945 Roethel Drive
Novi, MI 48375
(800) 866-5867
(248) 344-1770
FAX (248) 344-2555

Atlanta Regional Lab
400 Chastain Center Blvd., N.W., Suite 490
Kennesaw, GA 30144
(800) 252-9919
(770) 499-7800
FAX (770) 423-4890

San Francisco Regional Lab
1252 Quarry Lane
Pleasanton, CA 94566
(800) 294-1755
(510) 426-2657
FAX (510) 426-0106

Seattle Regional Lab
4836 E. Marginal Way S., Suite 215
Seattle, WA 98134
(800) 966-7755
(206) 763-7354
FAX (206) 763-4159

DISTRIBUTION:
White = Clayton Laboratory
Yellow = Clayton Accounting
Pink = Client Copy

11/95 20K

American
Xtal
Technology

VGF Excellence

October 13, 1997

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

Re: Generator Waste Profile Sheet (DZ2894) includes 2 RCRA empty Tanks

Dear Ms. Logan:

In our meeting last week you asked how American Xtal Technology managed the disposal of two RCRA empty tanks from our Dublin waste treatment operation. I indicated that these were transported to Chemical Waste Management's Kettleman Hills Facility under Uniform Hazardous Waste Manifest 9627028, which is found in Attachment "A" of the "August 7th report". You also asked why these items were not individually listed on this manifest. I indicated that they had been pre-approved for receipt under the DZ2894 Profile. You indicated that you will require documentation of this for your file.

Enclosed for your documentation please find a copy of Generator Waste Profile Sheet DZ2894 which includes the listing of two RCRA empty tanks (Poly 600 gal) for disposal at Chemical Waste Management's Kettleman Hills Facility.

I trust that this provides you with the information that you require.

Respectfully submitted,

American Xtal Technology

Edward J. Haggerty

Edward J. Haggerty, CIH
Manager of EH&S

Enclosure

4311 Solar Way, Fremont CA 94538 Tel (510) 683-5900 Fax (510) 683-5901

ISO 9002
Certificate No. 95/6271

Chemical Waste Management, Inc.

Date Printed 10/10/97

GENERATOR'S WASTE PROFILE SHEET

Profile # KHP DZ2894

(_) Check here if this is a Recertification LOCATION OF ORIGINAL KETTLEMAN HILLS FACILITY

GENERAL INFORMATION

1. Generator Name: AMERICAN XTAL TECHNOLOGY
Generator USEPA ID: CAD983595976

2. Generator Address: 6780 SIERRA CT STE 1
DUBLIN CA 94568-2600

Billing Address: AMERICAN XTAL TECHNOLOGY
(_) Same
4311 SOLAR WAY
FREMONT CA 94538-6389

3. Technical Contact/Phone: ED HAGGERTY 510/683-5900

4. Alternate Contact/Phone:

Billing Contact/Phone: ED HAGGERTY EXT 127 510/683-5900

PROPERTIES AND COMPOSITION

5. Process Generating Waste: DEMOLITION OF TENANT IMPROVEMENTS

6. Waste Name: DEBRIS CONTAMINATED WITH INORGANIC ARSENIC (TRACE)

7A. Is this a USEPA hazardous waste (40 CFR Part 261)? Yes (_) No (X)

B. Identify ALL USEPA listed and characteristic waste code numbers (D,F,K,P,U):

State Waste Codes: 181

8. Physical State @ 70F: A. Solid(X) Liquid(_) Both(_) Gas(_) B. Single Layer (X) Multilayer (_) C. Free liq. range 0 to 0%

9A. pH: Range _____ or Not applicable (X) B. Strong Odor (_);describe

10. Liquid Flash Point: < 73F (_) 73-99F (_) 100-139F (_) 140-199F (_) >= 200F (_) N.A. (X) Closed Cup (X) Open Cup (_)

11. CHEMICAL COMPOSITION: List ALL constituents (incl. halogenated organics) present in any concentration and forward analysis

Constituents	Range		Unit Description
DEBRIS (CONSTRUCTION)		to	
EXHAUST DUCTWORK	70 to	85	%
DRYWALL	10 to	20	%
FLOOR TILE*	0 to	5	%
PLASTIC PIPE	0 to	5	%
MISCELLANEOUS (WOOD)	10 to	20	% See attachment 2
TOTAL COMPOSITION (MUST EQUAL OR EXCEED 100%):		235.000000	

12. OTHER: PCBs if yes, concentration _ _____ ppm, PCBs regulated by 40 CFR 761 (_). Pyrophoric (_) Explosive (_) Radioactive (_) Benzene if yes, concentration _ _____ ppm. NESHAP (_) Shock Sensitive (_) Oxidizer (_) Carcinogen (_) Infectious (_) Other _____

13. If waste subject to the land ban & meets treatment standards, check here: _ & supply analytical results where applicable.

SHIPPING INFORMATION

14. PACKAGING: Bulk Solid (X) Bulk Liquid (_) Drum (_) Type/Size: CUBIC YARDS Other

15. ANTICIPATED ANNUAL VOLUME: 40 Units: CUBIC YARDS Shipping Frequency: ONE TIME

Sample Tracking Number: 4901071

SAMPLING INFORMATION

16a. Sample source (drum, lagoon, pond, tank, vat, etc.):

Date Sampled: _____ Sampler's Name/Company:

16b. Generator's Agent Supervising Sampling: 17. (X) No sample required (See instructions.)

GENERATOR'S CERTIFICATION

I hereby certify that all information submitted in this and all attached documents contains true and accurate descriptions of this waste. Any sample submitted is representative as defined in 40 CFR 261 - Appendix I or by using an equivalent method. All relevant information regarding known or suspected hazards in the possession of the generator has been disclosed. I authorize CWM to obtain a sample from any waste shipment for purposes of recertification.

Signature on original profile DZ2894 EDWARD J. HAGGERTY 7/14/97

Signature Name and Title Date

Date Printed 10/10/97

Profile #
KHF D22894

ATTACHMENT 2

CHEMICAL COMPOSITION: Additional constituents NOT included on page 1 of the Waste Profile

Constituents	Range	Unit Description
2 RCRA EMPTY TANKS (POLY 600 GAL)	0 to 100	%
* SOHS MAY CONTAIN <1% ASBESTOS; NON-FRIABLE	to	
ARSENIC TCLP	0 to 1.3	MG/L

American
Xtal
Technology

ENVIRONMENTAL PROTECTION
97 JUL 16 PM 3:05

VGF Excellence

July 15, 1997

how are we
acid spills -
health & Safety
workplan

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

Re: Addendum to Remedial Action Plan for 6780 Sierra Court, Suite I, Dublin

Dear Ms. Logan:

On April 25, 1997, American Xtal Technology submitted a remediation and closure plan for our former manufacturing facility in Dublin. The plan emphasized cleanup and/or removal of inorganic arsenic contaminated materials at the site. The focus of the intended removal activity was process-related equipment and/or systems (such as, process piping, exhaust ventilation ductwork and fan units, and non-recoverable equipment, such as custom benches, cabinets and shelving).

Following your review of this plan, American Xtal Technology met with the property owner to incorporate his requirements for this activity. The Owner, B/G Management, specified that their requirement of American Xtal Technology in vacating Suite I was for us to remove all tenant improvements made to property during our occupancy.

American Xtal Technology developed a modified scope of work that took the owner's requirements into consideration and selected an environmental contractor, Synergy Environmental, to execute the work. The scope of work is outlined in Attachment 1.

The principal tasks before Synergy Environmental are to: (1) remove all floor coverings throughout the facility (resilient flooring in production areas, carpeting in non-production environments); (2) demolish interior production area walls, ceilings, and utilities (HVAC, electrical, plumbing); (3) segregate inorganic contaminated items, such as process exhaust ductwork from general HVAC ducting, visually clean tile from gray stained gallium arsenide stained tile, for handling and disposal as non-RCRA hazardous waste; and finally, following completion of demolition activities, (4) perform a thorough HEPA vacuuming and cleanup of the space to remove any significant trace of inorganic arsenic compound (gallium arsenide) particulate from remaining facility elements.

but the floors as already removed

4311 Solar Way, Fremont CA 94538 Tel (510) 683-5900 Fax (510) 683-5901

ISO 9002 SGS
Certificate No. 95/6271

Management of California classified waste, materials with the toxic characteristic of contamination with inorganic arsenic compounds, will be in accordance with existing Land Disposal Restrictions and treatment requirements. These materials will be manifested and transported for disposal to Waste Management's Kettleman Hills Facility.

With respect to chemicals currently on site, these fall into two categories: (1) materials classified as wastes, which will be lab-packed, manifested, and disposed of hazardous wastes; and, (2) materials, which continue to have economic value, which will be suitably packaged, listed under a general bill of lading, and transported to our Fremont facility. For this work, American Xtal Technology is working with Laidlaw Environmental, formerly Rollins Environmental.. Laidlaw is one of our routine hazardous waste service providers.

Where concerns about the possibility of the presence of corrosive chemicals are identified, such as discoloration of floor tiles around wet benches, American Xtal Technology will utilize a color indicating acid detection spray to identify contaminated surfaces that may require pH neutralization. Past practice has been to address minor spills in the workplace at the time that they occur, so we would anticipate actual identification of a problem to be the exception not the rule.

Lastly, American Xtal Technology has operated a Conditionally Authorized treatment unit at this site for many years. Under state rules, until July 1, 1997, operators of such units were permitted to certify the closure notification for such units. Under the new CUPA rules, American Xtal Technology will work with the County of Alameda to achieve closure. As a part of this process it is our intention to provide the County with the following when our work is concluded:

1. A copy of the front page of the original Facility Specific Notification (DTSC form 1772).

2. A closure notification letter that the unit was closed according to the requirements pursuant to the Hazardous Waste Control Law. This notification shall include:

   A. facility/company name
   B. EPA identification number
   C. location and mailing address
   D. the tier the unit was operating under
   E. the date the unit was removed or decontaminated
   F. the reason for closing or changing status
   G. the steps taken to close the unit.

I trust that this addendum to our earlier submittal clarifies the intent of our remediation and closure effort. Should you have any questions or comments, please do not hesitate to contact me.

Sincerely,

American Xtal Technology

Edward J. Haggerty

Edward Haggerty, CIH
Manager of EH&S

cc: Mr. Sam Genirberg
B/G Management
2520 College Avenue
Berkeley, CA 94704
Tel. 510-848-3608
Fax 510-848-3618

Attachment 1.

Scope of Work at 6780 Sierra Court, Suite I

Demolition Plans (Ground, second floors, roof)

Addendum 1 7/2/97

Agreement between American Xtal Technology and Synergy Environmental

Outline of Scope of Work and Specific Work Tasks

1. Remove and dispose of roof top utilities (piping, electrical feed lines), which are classified as AXT tenant improvements to Suite I.

2. Remove and dispose of remaining roof top exhaust blower units and ducting.

3. HEPA vacuum the area surrounding roof top blowers to remove any residual inorganic arsenic particulate.

4. Remove all tenant improvement ductwork from facility. Process related ductwork shall be segregated from HVAC ducting. HVAC related ducting exteriors shall be wipes clean and may be disposed of or recycled as non-hazardous scrap metal. Process related ductwork interior shall be inspected for dust loading. Sections with appreciable loading shall be treated as a California hazardous waste (Non-RCRA hazardous waste solid with a toxic characteristic of bioaccumulative/biopersistant inorganic compound). Sections which are essentially free of dust loading shall be treated as non-hazardous waste materials.

5. Remove all process related piping, plastic, copper, iron, and all other types of materials from the space. Supply lines (domestic water, deionized water lines etc.) may be disposed of a demolition debris. Return or waste lines shall be segregated from process piping and shall be managed or treated as a California hazardous waste (Non-RCRA hazardous waste solid with a toxic characteristic of bioaccumulative/biopersistant inorganic compound).

6. Remove all interior tenant improvement walls, suspended ceilings, light fixtures, electrical conduit, and floor covering in all areas of the facility, except: the (1) Front Office Area: walls to remain (ceiling, ventilation ducting and carpeting to be removed); and, (2) Second Floor: HEPA vacuum ceiling tiles and wipe clean lighting fixtures and other above ceiling elements, retain ceiling/lighting/ventilation registers (remove and dispose of carpeting and pad - leave exposed plywood subfloor).

7. Pipe penetrations to be terminated at floor level (cropped flush and grout filled as necessary) or immediately inside remaining perimeter or demise walls.

8. ACM Flooring in the lunch room area shall be removed. Removal of the particle board underlayment which overlays the plywood subfloor will facilitate removal of both flooring and mastic. Plywood subfloor to remain. No replacement of flooring or carpeting in this area will be required.

9. Remaining equipment in the Waste Treatment Area will be decontaminated and removed, and disposed of as California hazardous (non-RCRA hazardous) waste. Filter press has been previously removed. Hoist to be removed at subfloor level and taken out in sections as required for disposal.

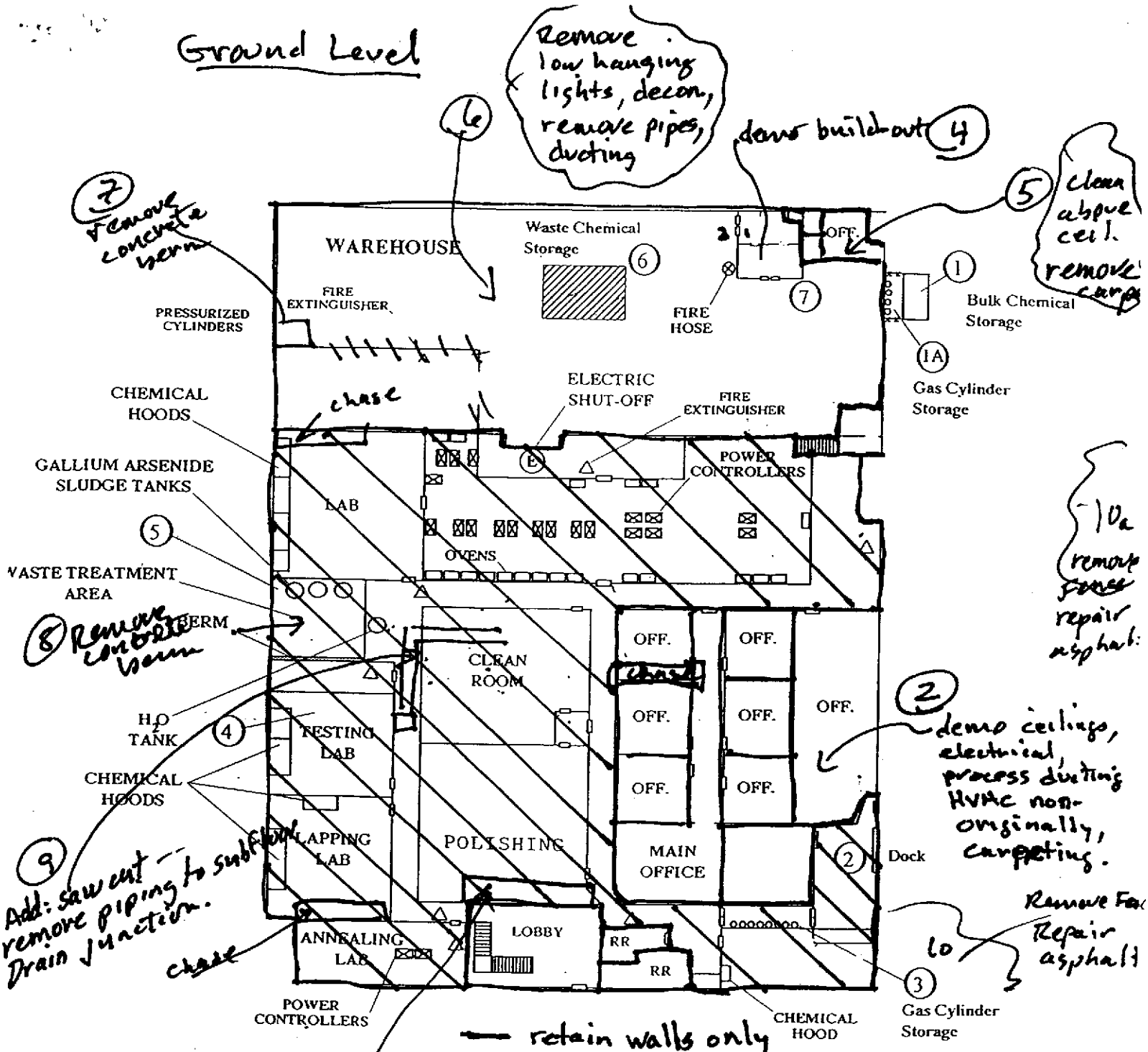
10. Concrete floor in Waste Treatment, approximately 270 sq. ft., will be decontaminated and removed. Restoration of the concrete floor will involve placement of No. 4 reinforcement steel placed 12" OC/EW and tied into the existing floor by placement of steel pins with and epoxy inbedment of at least 6" and a ties overlap of 18" minimum at each joint, or equivalent, Concrete pour shall be a nominal 6" thickness. Concrete shall pass a compressive strength of 2,800 psi at full cure.

11. Outside Waste Treatment to Clean Room, saw cut concrete and remove drain line from Clean Room Discharge to floor drain junction. Fill trench. Refinish concrete floor to match existing.

12. Secondary containment berm for tank in warehouse to be removed and ground flush with existing concrete finish floor.

13. Exterior fence enclosures shall be removed and associated asphalt areas shall be restored to match existing materials, slopes and grade.

14. Fluorescent lighting tubes shall be removed and repackaged as mercury containing wastes for recycle at an approved site. Light ballasts shall be assumed to be PCB-containing, until shown otherwise, and shall be packaged for treatment and recycling at an approved site.

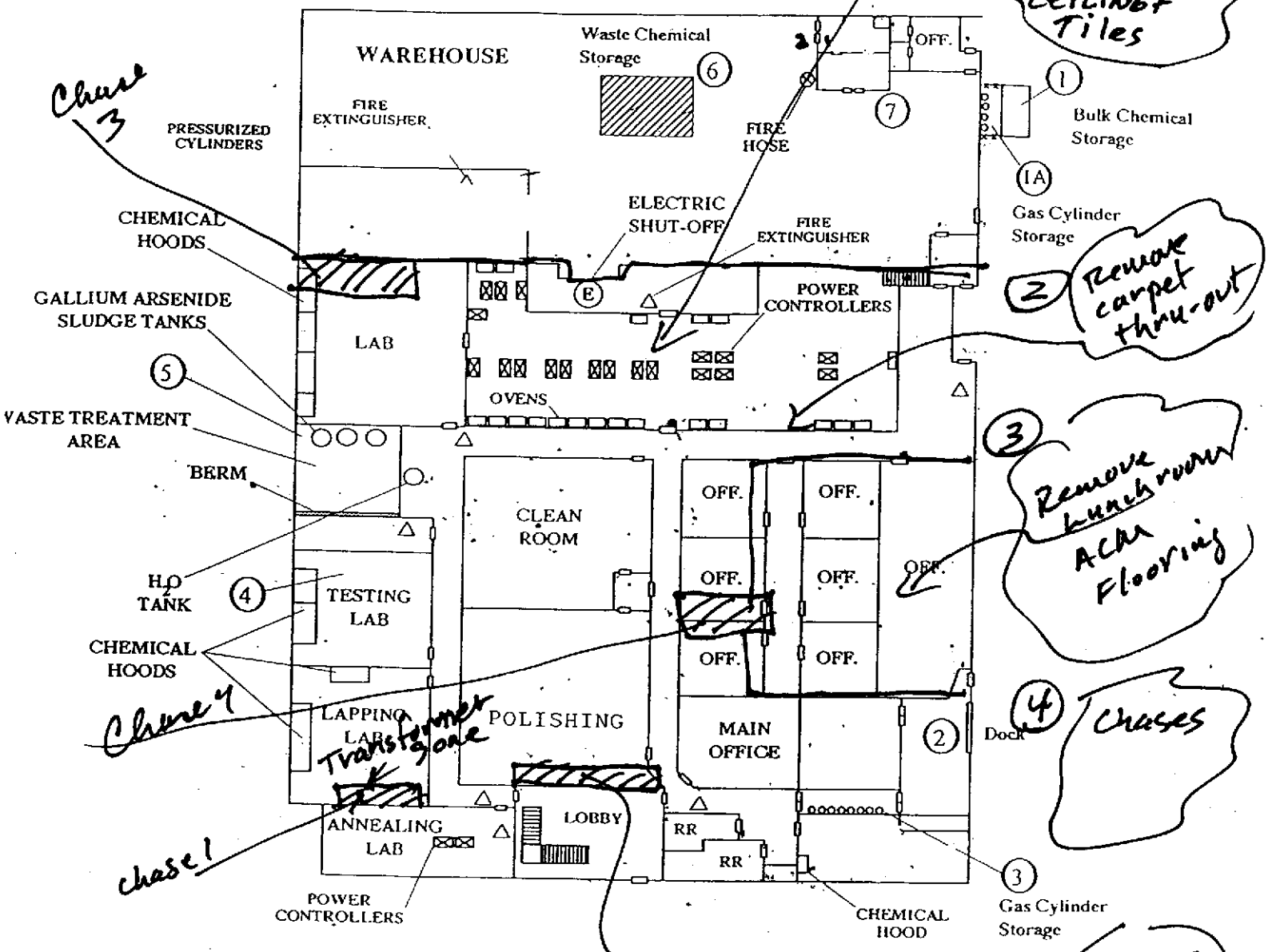


AMERICAN XTAL TECHNOLOGY
6780 SIERRA COURT
DUBLIN, CALIFORNIA 94568

"SITE MAP" – MAIN BUILDING

Date: November 17, 1994

ILLUSTRATIVE OF 2nd Floor
General locations!



Chase 3

Chase 4

Transformer zone

chase 1

1 HEPA Vac + clean above drop CEILING retain existing CEILING + Tiles

2 Remove carpet thru-out

3 Remove Lunchroom ACM Flooring

4 Chases

5 Remove Abandoned electrical conduit / service

/// demo structure chase 2
remove duct work
patch + repair openings

AMERICAN XTAL TECHNOLOGY
6780 SIERRA COURT
DUBLIN, CALIFORNIA 94568

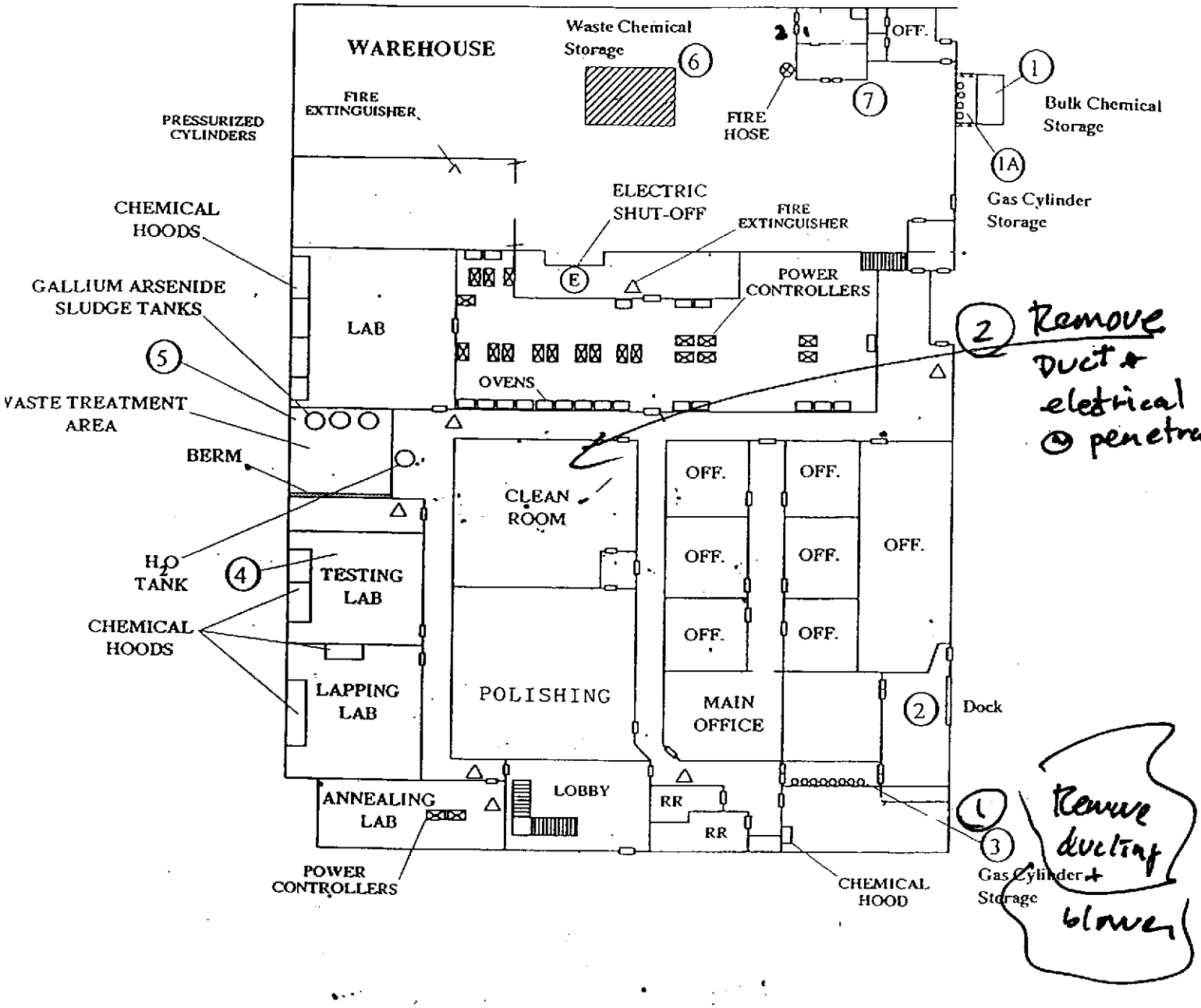
"SITE MAP" – MAIN BUILDING

N

Scale in Feet
0 20 40

Date: November 17, 1994

Illustrative of Roof



AMERICAN XTAL TECHNOLOGY
6780 SIERRA COURT
DUBLIN, CALIFORNIA 94568

"SITE MAP" – MAIN BUILDING

N

Scale in Feet
0 20 40

Date: November 17, 1994

American Xtal Technology

MGF Excellence

April 25, 1997

Ms. Madulla Logan
Alameda County Health Agency
Division of Environmental Protection
Dept. Of Environmental Health
1131 Harbor Bay Parkway, 2nd Floor
Alameda, CA 94502

Re: Closure of American Xtal Technology's Main Dublin Site
Located at 6780 Sierra Court, Suite I, Dublin, CA

Dear Ms. Logan:

Enclosed is a copy of AXT's plan for remediation and closure at 6780 Sierra Court, Suite I.

As you may know from your past association with Jeff Shapiro, and the closure of one other AXT site in Dublin, AXT has been in the process of relocating most of its semiconductor wafer manufacturing operations to its newly constructed facility in Fremont. Since June of 1996, its principal operations (manufacture of gallium arsenide crystals and wafers, and other semiconductor materials such as indium and gallium phosphide) have been run out of Fremont. Over the intervening period, the Dublin facility has served largely as a site for limited R&D work and warehouse storage. Over the past several months, AXT has decided to phase out our limited operations in Dublin altogether.

The enclosed plan addresses the concerns that we have in terms of returning this space to the property owner, principally absent detectable amounts of inorganic arsenic in the aftermath of our former manufacturing activities.

We believe the time frame for implementing corrective action, cleaning and/or removing trace amounts of inorganic arsenic contamination at the site, is about a 4 to 5 week process. Our initial plan is to proceed with relocation of warehoused goods to new temporary storage in the Fremont area almost immediately. At the same time, we intend to also proceed with the final disposition of stored chemical wastes and the relocation of chemical stock. We hope to initiate cleanup by the second week of May and complete all closure activities by mid June, with

4311 Solar Way, Fremont CA 94538 Tel (510) 683-5900 Fax (510) 683-5901

confirmational testing and review by all interested parties completed by the end of June.

It is our hope that we can move this process along expeditiously. Our intent is to expedite the actual work and to facilitate communications on the status and outcome of work tasks to interested parties (i.e., the Owner, the County, Doughty Regional Fire Authority, and the Dublin San Ramon Services District) to the greatest extent possible.

Please advise me of the fees required by the County to execute this process. As well as any questions or comments that you might have with respect to this matter.

Best Regards,

Edward J. Haggerty

Edward J. Haggerty, CIH, CAC
Manager of Environmental Health and Safety

cc: B&G Management
Dougherty Regional Fire Authority
Dublin San Ramon Services District
City of Dublin Building Dept.