

STATE OF CALIFORNIA
CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
SANTA CRUZ WATER REGION

S U P P L E M E N T A L

EXECUTIVE OFFICER SUMMARY REPORT
MEETING DATE: SEPTEMBER 16, 1987

ITEM: 2

SUBJECT: U.S. DEPARTMENT OF THE NAVY, MOFFETT FIELD NAVAL AIR STATION,
MOFFETT FIELD, SANTA CLARA COUNTY - REQUEST TO CONSIDER
ISSUANCE OF CEASE AND DESIST ORDER

DISCUSSION: Attached are a revised Cease and Desist Order and a summary
of the proposed schedule changes included in the Order.

File No. 2189.8009

Appendices

- A. Tentative Cease And Desist Order
- B. Summary of Proposed Schedule Changes to Tentative Order
- C. Correspondence

APPENDIX A

**CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
SAN FRANCISCO BAY REGION**

ISSUED TECHNICAL ORDER

REQUIRING THE UNITED STATES DEPARTMENT OF THE NAVY, MOFFETT FIELD NAVAL AIR STATION, MOUNTAIN VIEW, SANTA CLARA COUNTY, TO CEASE AND DESIST DISCHARGING WASTE IN VIOLATION OF WATER DISCHARGE REQUIREMENTS, THE CALIFORNIA WATER CODE, REQUIREMENTS OF THE WATER QUALITY CONTROL PLAN FOR THE SAN FRANCISCO BAY BASIN, THE FEDERAL SUPERFUND AMENDMENTS AND REAUTHORIZATION ACT OF 1986, AND FROM DISCHARGING TO DISCHARGE WASTE IN VIOLATION OF THE CALIFORNIA WATER CODE AND THE TOXICS FIT CLEANUP ACT OF 1984.

The California Regional Water Quality Control Board, San Francisco Bay Region (hereinafter called the Board), finds that:

1. The United States Department of the Navy, Moffett Field Naval Air Station (hereinafter called the discharger) occupies approximately 4,000 acres of land at Moffett Field, located between the Cities of San Bruno and Mountain View, Santa Clara County. The discharger commenced operations at this site in 1933. Since its beginning, the discharger has been utilized for a number of Army and Navy operations including assembly, overhaul, repair, fueling, and landing facilities for airplanes, helicopters, airplanes and jets.
2. The discharger's operations have involved the storage, handling, and disposal of raw and waste product hazardous materials. The hazardous materials used onsite, either currently or historically, include trichloroethane (TCE), 1,1,1-trichloroethane (TCA), tetrachloroethane (PCE), polychlorinated biphenyls (PCBs), various pesticides, fuels, oils, and other organic solvents.
3. Subsurface investigations were initiated at two underground solvent tanks in April 1983 and revealed volatile organic compound (VOC) pollution in both soil and groundwater adjacent to one of the tanks.
4. In addition to further groundwater investigations near the solvent tanks, the discharger also began conducting an Initial Assessment Study (IAS) in 1983 to identify possible environmental pollution from past use and disposal of hazardous materials on the entire site. In April 1984, the discharger requested that additional investigations of groundwater pollution be delayed until the Initial Assessment Study was completed and that further investigations be included in the "Confirmation Study," which was to be the next phase of the discharger's investigation program.
5. The Initial Assessment Study was submitted to the Regional Board in May 1984. The study identified nine sites at Moffett Field where potentially hazardous materials were disposed or spilled. The nine sites identified in the IAS are listed below:

<u>Site Number</u>	<u>Description</u>
1	Runway Landfill
2	Golf Course Landfill

APPENDIX A – TENTATIVE CEASE AND
DESIST ORDER
PAGE 2

HEARING TO CONSIDER ISSUANCE OF CEASE
AND DESIST ORDER

THE ABOVE IDENTIFIED PAGE IS NOT
AVAILABLE.

EXTENSIVE RESEARCH WAS PERFORMED BY
NAVFAC SOUTHWEST TO LOCATE THIS PAGE.
THIS PAGE HAS BEEN INSERTED AS A
PLACEHOLDER AND WILL BE REPLACED
SHOULD THE MISSING ITEM BE LOCATED.

QUESTIONS MAY BE DIRECTED TO:

DIANE C. SILVA
RECORDS MANAGEMENT SPECIALIST
NAVAL FACILITIES ENGINEERING COMMAND
SOUTHWEST
1220 PACIFIC HIGHWAY
SAN DIEGO, CA 92132

TELEPHONE: (619) 532-3676

12. The discharger is in violation of Order 85-66, for failing to submit a satisfactory technical report required by the June 1, 1986 compliance date for Provision C.3.d and C.4.d. The discharger's preliminary technical report dated November 13, 1985 contained initial investigations for sites 1 through 9; however, additional investigations at all nine sites were needed to complete the scope of work required to comply with these provisions. To date, the discharger has not conducted the necessary additional investigations.
13. Provision C.5. of Order 85-66 required the discharger to conduct an investigation to identify, locate, and collect information on wells with potential to act as conduits for pollution to nearby deep aquifers according to the following compliance schedule:
- a. Provision C.5.a. - Identify private wells, to the extent possible, in the vicinity of the site with potential to act as conduits for inter-aquifer cross-contamination. Compliance Date: November 1, 1985
 - b. Provision C.5.b. - Locate and collect additional information on private wells identified in Provision C.5.a to assess if the wells may be potential conduits for inter-aquifer cross-contamination. Compliance Date: January 1, 1986
 - c. Provision C.5.c. - Develop a program to respond to any potential conduits and submit a technical report with options for addressing closure. Compliance Date: February 1, 1986
14. The discharger is in violation of Order No. 85-66, for failing to submit satisfactory technical reports required by the January 1, 1986 compliance date for Provision C.5.b. and February 1, 1986 compliance date for Provision C.5.c. The discharger submitted a technical report on November 13, 1985 that identified some active, inactive, and abandoned wells, and submitted a technical report on March 21, 1986 that contained additional data on the active wells. However, these reports were inadequate because the abandoned well search was incomplete, abandoned wells were not field located, and the additional data needed to evaluate the threat posed by the wells was not provided.
15. Provision C.8, of Order No. 85-66, stated that "interim containment of the pollution plume shall commence in areas of known pollution as soon as practicable, but in any event shall not be delayed pending defining the full extent of pollution in any aquifer. The interim cleanup and containment plans, including time schedule, shall be submitted by January 15, 1986."
16. The discharger violated the compliance date for Provision C.8. by submitting the interim cleanup plan on March 21, 1986 - two months later than required. As of July 1987, the discharger had not undertaken any field work to implement the interim cleanup plan since its approval on July 23, 1986. Thus, the discharger has failed to comply with the intent of Provision C.8. by failing to commence interim containment in a timely manner.

APPENDIX A – TENTATIVE CEASE AND
DESIST ORDER
PAGE 4

HEARING TO CONSIDER ISSUANCE OF CEASE
AND DESIST ORDER

THE ABOVE IDENTIFIED PAGE IS NOT
AVAILABLE.

EXTENSIVE RESEARCH WAS PERFORMED BY
NAVFAC SOUTHWEST TO LOCATE THIS PAGE.
THIS PAGE HAS BEEN INSERTED AS A
PLACEHOLDER AND WILL BE REPLACED
SHOULD THE MISSING ITEM BE LOCATED.

QUESTIONS MAY BE DIRECTED TO:

DIANE C. SILVA
RECORDS MANAGEMENT SPECIALIST
NAVAL FACILITIES ENGINEERING COMMAND
SOUTHWEST
1220 PACIFIC HIGHWAY
SAN DIEGO, CA 92132

TELEPHONE: (619) 532-3676

25. The tanks and sumps at Sites 14 through 17 constitute a violation and threaten to cause releases to the Basin Plan prohibition cited in Finding 23. Documented releases to groundwater have occurred at 6 of the 31 tanks/sumps which have been investigated and therefore are in violation of the Basin Plan. An additional 6 of 31 tanks/sumps investigated have failed pressure testing of the piping or tank, which indicates a leak has occurred. Also, there remain 37 tanks and sumps which have not been investigated. Some of these tanks may be leaking - based on the high percentage (12 of 31) of investigated tanks found to be leaking and the similarity in age and composition of those compared to the uninvestigated tanks. Therefore, they constitute a threatened violation of the Basin Plan prohibition. In addition, the discharger is in violation of Water Code Section 13260 for failure to file a report of waste discharge for the documented releases.
26. The discharger is required to submit a Solid Waste Assessment Test (SWAT) report pursuant to Section 13273 of the California Water Code for Sites 1 and 2 landfills by July 1, 1986. The discharger has not submitted a plan to perform the required test.
27. The discharger has caused or permitted, and threatens to cause or permit waste to be discharged or deposited where it is or probably will be discharged to waters of the State and creates or threatens to create a condition of pollution or nuisance.
28. Onsite and offsite interim containment and cleanup measures need to be implemented to alleviate the threat to the environment posed by the continued migration of pollutants and to provide a substantive technical basis for designing and evaluating the effectiveness of final cleanup alternatives.
29. This action is an order to enforce the laws and regulations administered by the Board. This action is categorically exempt from the provisions of the California Environmental Quality Act (CEQA) pursuant to Section 15321 of the Resources Agency Guidelines.
30. The Board has notified the discharger and interested agencies and persons of its intent under California Water Code Section 13301 to issue this Order and has provided them with an opportunity for a public hearing and an opportunity to submit their written views and recommendations.
31. The Board, in a public hearing, heard and considered all comments pertaining to the discharge.

IT IS HEREBY ORDERED, pursuant to Section 13301 of the California Water Code, that the discharger Cease and Desist from discharging waste in violation of Waste Discharge Requirements, the California Water Code, the prohibitions of the Water Quality Control Plan for the San Francisco Bay Basin, the Federal Superfund Amendments and Reauthorization Act of 1986, and from threatening to discharge waste in violation of the California Water Code and the Toxics Pit Cleanup Act of 1984 as described in Findings 3 through 26, above. Compliance shall be achieved as follows:

APPENDIX A – TENTATIVE CEASE AND
DESIST ORDER
PAGE 6

HEARING TO CONSIDER ISSUANCE OF CEASE
AND DESIST ORDER

THE ABOVE IDENTIFIED PAGE IS NOT
AVAILABLE.

EXTENSIVE RESEARCH WAS PERFORMED BY
NAVFAC SOUTHWEST TO LOCATE THIS PAGE.
THIS PAGE HAS BEEN INSERTED AS A
PLACEHOLDER AND WILL BE REPLACED
SHOULD THE MISSING ITEM BE LOCATED.

QUESTIONS MAY BE DIRECTED TO:

DIANE C. SILVA
RECORDS MANAGEMENT SPECIALIST
NAVAL FACILITIES ENGINEERING COMMAND
SOUTHWEST
1220 PACIFIC HIGHWAY
SAN DIEGO, CA 92132

TELEPHONE: (619) 532-3676

including a map showing the locations of any soil borings and monitoring wells to be installed.

~~COMPLIANCE DATE: March 15, 1988~~ November 30, 1988

(6) **COMPLETION OF CONSTRUCTION:** Submit a technical report acceptable to the Executive Officer documenting completion of the necessary tasks identified in the technical report submitted for Provision 1a(5), above.

~~COMPLIANCE DATE: July 15, 1988~~ July 15, 1989

(7) **SUBMIT TECHNICAL PROPOSAL:** Submit a technical report acceptable to the Executive Officer containing a proposal to complete definition of the vertical and lateral extent of soil and groundwater pollution at all sites. The investigation proposal should be in accordance with an approved Sampling Plan and Quality Assurance Project Plan, including a map showing the locations of any soil borings and monitoring wells to be installed.

~~COMPLIANCE DATE: July 15, 1988~~ July 30, 1989

b. **Potential Conduit Investigation, Evaluation, and Closure**

(1) **IDENTIFICATION OF POTENTIAL CONDUITS:** Submit a technical report acceptable to the Executive Officer which summarizes the results of a record search, aerial photography search, and interviews conducted to identify any private and public wells which may act as vertical conduits for pollution to migrate from shallow to deep aquifers.

~~COMPLIANCE DATE: October 15, 1987~~ January 15, 1988

(2) **EVALUATION OF POTENTIAL CONDUITS:** Submit a technical report acceptable to the Executive Officer which summarizes the results of field work conducted to evaluate potential conduits identified in the technical report submitted to comply with Provision 1.b(1), above. The field work shall include, at a minimum, the results of any sampling, geophysical techniques, and television inspections, conducted to locate and evaluate potential conduits.

~~COMPLIANCE DATE: December 15, 1987~~ June 30, 1988

(3) **POTENTIAL CONDUIT CLOSURE REPORT:** Submit a technical report acceptable to the Executive Officer which describes well sealing or other effective measures which will be taken to prevent migration of pollutants to lower aquifers via any potential conduits identified in the technical report submitted to comply with Provision 1.b(2), above.

~~COMPLIANCE DATE: March 15, 1988~~ July 30, 1988

APPENDIX A – TENTATIVE CEASE AND
DESIST ORDER
PAGE 8

HEARING TO CONSIDER ISSUANCE OF CEASE
AND DESIST ORDER

THE ABOVE IDENTIFIED PAGE IS NOT
AVAILABLE.

EXTENSIVE RESEARCH WAS PERFORMED BY
NAVFAC SOUTHWEST TO LOCATE THIS PAGE.
THIS PAGE HAS BEEN INSERTED AS A
PLACEHOLDER AND WILL BE REPLACED
SHOULD THE MISSING ITEM BE LOCATED.

QUESTIONS MAY BE DIRECTED TO:

DIANE C. SILVA
RECORDS MANAGEMENT SPECIALIST
NAVAL FACILITIES ENGINEERING COMMAND
SOUTHWEST
1220 PACIFIC HIGHWAY
SAN DIEGO, CA 92132

TELEPHONE: (619) 532-3676

(2) REMOVE LIQUID HAZARDOUS WASTES: Remove all liquid hazardous wastes or hazardous material containing free liquids from Site 10 surface impoundments.

COMPLIANCE DATE: June 30, 1988

b. Subchapter 15 Requirements

(1) REPORT OF WASTE DISCHARGE: Submit a Report of Waste Discharge acceptable to the Executive Officer in accordance with Subchapter 15 for the Site 10 surface impoundments.

COMPLIANCE DATE: March 1, 1988

(2) CLOSURE PLAN: Submit a closure plan acceptable to the Executive Officer in accordance with Subchapter 15 for the Site 10 surface impoundments.

COMPLIANCE DATE: March 1, 1988

3. Landfills

a. SOLID WASTE ASSESSMENT TEST PROGRAM: Submit a technical report acceptable to the Executive Officer outlining the program for conducting a Solid Waste Assessment Test for Sites 1 and 2 landfills.

COMPLIANCE DATE: ~~October 30, 1987~~

December 15, 1987

b. SUBMIT SOLID WASTE ASSESSMENT TEST REPORT: Submit a technical report acceptable to the Executive Officer documenting completion of the necessary tasks identified in the technical report submitted for Provision 3.a., above.

COMPLIANCE DATE: July 1, 1988

4. COMPLETION OF INVESTIGATION DEFINING THE VERTICAL AND LATERAL EXTENT OF POLLUTION IN SOILS, GROUNDWATER AND SHALLOW SEDIMENTS OF RECEIVING WATERS AT AND FROM ALL SITES: The discharger shall submit a final Remedial Investigation (RI) report acceptable to the Executive Officer completely defining the extent of soil and groundwater pollution associated with all sites at Moffett Field. The report shall be consistent with guidance provided by Subpart F of the National Oil and Hazardous Substances Pollution Contingency Plan (40 CFR Part 300), as amended; the Superfund Amendments and Reauthorization Act of 1986; Section 25356.1(c) of the California Health and Safety Code; and CERCLA guidance documents with reference to Remedial Investigations.

COMPLIANCE DATE: ~~November 30, 1988~~

May 15, 1990

5. PROPOSED FINAL CLEANUP OBJECTIVES AND ACTIONS: Submit a Feasibility Study (FS) technical report acceptable to the Executive Officer containing an evaluation of the installed interim remedial measures; an evaluation of alternative final remedial measures; the recom-

**APPENDIX A – TENTATIVE CEASE AND
DESIST ORDER
PAGE 10**

**HEARING TO CONSIDER ISSUANCE OF CEASE
AND DESIST ORDER**

**THE ABOVE IDENTIFIED PAGE IS NOT
AVAILABLE.**

**EXTENSIVE RESEARCH WAS PERFORMED BY
NAVFAC SOUTHWEST TO LOCATE THIS PAGE.
THIS PAGE HAS BEEN INSERTED AS A
PLACEHOLDER AND WILL BE REPLACED
SHOULD THE MISSING ITEM BE LOCATED.**

QUESTIONS MAY BE DIRECTED TO:

**DIANE C. SILVA
RECORDS MANAGEMENT SPECIALIST
NAVAL FACILITIES ENGINEERING COMMAND
SOUTHWEST
1220 PACIFIC HIGHWAY
SAN DIEGO, CA 92132**

TELEPHONE: (619) 532-3676

June 15, 1988

...commencing with the monthly report due on ... the monthly reports shall include, but need not ... updated water table and piezometric surface maps for all affected water bearing zones, cross-sectional geologic maps describing the hydrogeologic setting of the site, and appropriately scaled and detailed base maps showing the location of all monitoring wells, piezometers, and extraction wells, and identifying adjacent facilities and structures.

10. All hydrogeologic plans, specifications, reports, and documents shall be signed by or stamped with the seal of a registered geologist, engineering geologist or professional engineer.
11. All samples shall be analyzed by State certified laboratories or laboratories accepted by the Board using approved EPA methods for the type of analysis to be performed. All laboratories shall maintain quality assurance/quality control records for Board review.
12. Copies of all correspondence, reports, and documents pertaining to compliance with the Prohibitions and Provisions of this Order shall be provided to the following agencies:
 - a. Santa Clara Valley Water District
 - b. Santa Clara County Health Department
 - c. City of Mountain View
 - d. State Department of Health Services/TSCD
 - e. State Water Resources Control Board
 - f. U. S. Environmental Protection Agency, Region 9

The Executive Officer may additionally require copies of correspondence, reports and documents pertaining to compliance with this Order to be provided to a local repository for public use.

13. If any hazardous substance is discharged in or on any waters of the State, or discharged and deposited where it is, or probably will be discharged in or on any waters of the State, the discharger shall report such discharge to this Regional Board, at (415) 464-1255 on weekdays during office hours from 8 a.m. to 5 p.m., and to the Office of Emergency Services at (800) 852-7550 during non-business hours. A written report shall be filed with the Regional Board within five (5) working days and shall contain information relative to the nature of waste or pollutant, quantity involved, duration of incident, cause of spill, Spill Prevention, Control, and Countermeasure Plan (SPCC) in effect, if any, estimated size of affected area, nature of effects, corrective measures that have been taken or planned, and a schedule of these activities, and persons/agencies notified.
14. The Board will review this Order periodically and may revise the requirements when necessary.

APPENDIX B

RECOMMENDED SCHEDULE CHANGES

ITEM (NUMBER)	T.O. DATE	NAVY DATE	REVISED DATE	NEW T.O. MINUS OLD T.O. (MONTHS)	NEW T.O. MINUS NAVY DATE (MONTHS)
INITIALS WORK [B.1.a.(1)]	10/15/87	6/30/88	3/15/88	+ 8	- 3 1/2
PROPOSAL [B.1.a.(2)]	10/1/87	3/1/88	12/15/87	+ 2 1/2	- 2 1/2
INITIALS WORK ² [B.1.a.(3)]	10/30/87	6/30/88	3/15/88	+ 4 1/2	- 3 1/2
PHASE 1 REPORT [B.1.a.(4)]	2/27/88	4/30/89	11/15/88	+ 9	- 8
PHASE 2 PROPOSAL [B.1.a.(5)]	3/15/88	5/30/89	11/30/88	+ 8 1/2	- 6
PHASE 2 REPORT [B.1.a.(6)]	7/15/88	8/30/89	7/15/89	+ 12	- 13 1/2
PHASE 3 PROPOSAL [B.1.a.(7)]	7/15/88	9/30/89	7/30/89	+ 12 1/2	- 14
IDENTIFY WELLS [B.1.b.(1)]	10/15/87	3/15/88	1/15/88	+ 3	- 2
EVALUATE WELLS [B.1.b.(2)]	12/15/87	9/30/88	6/30/88	+ 6 1/2	- 3
WELL CLOSURE REPORT [B.1.b.(3)]	3/15/88	10/30/88	7/30/88	+ 4 1/2	- 3
INTERIM CLEANUP PLAN [B.1.c.(1)]	10/1/87	4/30/89	8/15/88	+ 9 1/2	- 8 1/2
COMPLETE INT. CLEANUP [B.1.c.(2)]	3/1/88	4/30/91	8/15/89	+ 16 1/2	- 8 1/2
ADD'L INTERIM PLANS [B.1.c.(3)]	4/30/88	7/30/89	12/30/88	+ 8	- 7
COMPLETE INT. CLEANUP [B.1.c.(4)]	11/20/88	7/30/91	12/30/89	+ 13	- 7
SOAT PROPOSAL (B.3.a.)	10/30/87	12/31/87	12/15/87	+ 1	- 1
SOAT REPORT (B.3.b.)	7/1/88	4/30/89	7/1/88	0	- 10
COMPLETE DEFINITION (B.4.)	11/20/88	1/30/92	5/15/90	+ 18	- 19 1/2
FINAL CLEANUP PLAN (B.5.)	4/30/89	2/30/93	10/30/90	+ 18	- 28
COMMITMENT TO COMPLY (B.6.)	10/1/87	NONE	10/30/87	+ 1	
MONTHLY REPORTS (B.9.)	9/15/87	NONE	10/15/87	+ 1	
QUARTERLY REPORTS (B.9.)	12/15/87	NONE	6/15/88	+ 6	

Appendix C

APPENDIX C – CORRESPONDENCE

**HEARING TO CONSIDER ISSUANCE OF CEASE
AND DESIST ORDER**

**THE ABOVE IDENTIFIED APPENDIX IS
INCOMPLETE. IT COULD NOT BE DETERMINED
WHETHER SOME PAGES ARE MISSING OR THE
DOCUMENT WAS ISSUED WITHOUT THEM.**

QUESTIONS MAY BE DIRECTED TO:

**DIANE C. SILVA
RECORDS MANAGEMENT SPECIALIST
NAVAL FACILITIES ENGINEERING COMMAND
SOUTHWEST
1220 PACIFIC HIGHWAY
SAN DIEGO, CA 92132**

TELEPHONE: (619) 532-3676

INTEL CORPORATION
3085 Bowers Avenue
Santa Clara, California 95051
(408) 967-8080
TWX - 910 338 0028 TELEX - 34-6372



September 15, 1987

VIA COURIER

Mr. Roger B. James
Executive Officer
California Regional Water
Quality Control Board
San Francisco Bay Region
1111 Jackson Street
Oakland, CA

CALIFORNIA REGIONAL WATER

SEP 15 1987

QUALITY CONTROL BOARD

Re: Tentative Order
U.S. Department of the Navy
Moffett Field Naval Air Station

Dear Mr. James:

I am writing to you on behalf of Fairchild Semiconductor Corporation, Intel Corporation, and Raytheon Company to support the staff's tentative cease and desist order regarding Moffett Field Naval Air Station in Santa Clara County, and to urge the Board to refer lead responsibility for further supervision of the Moffett Field site to the United States Environmental Protection Agency.

Fairchild, Intel, and Raytheon strongly support the Regional Board in its efforts to obtain prompt characterization and remediation of the Moffett Field site. We therefore fully support issuance of the proposed order. At the same time, we also believe the Regional Board should refer lead responsibility for further regulatory supervision of Moffett Field to EPA. Such a referral is, we believe, mandated by section 120 of the Superfund Amendments and Reauthorization Act of 1986, 42 U.S.C. § 9620, is consistent with the Board's earlier decision to refer the adjoining Middlefield-Ellis-Whisman site to EPA, and is best calculated to ensure the prompt and comprehensive identification and remediation of all chemical sources impacting groundwater conditions throughout the regional area.

Sincerely,

A handwritten signature in cursive script that reads "John Masterman".

John Masterman
Project Coordinator
NEW RI/FS

earliest opportunity. In addition, please don't hesitate to keep [redacted] to the progress of the clean-up of Moff [redacted] materials.

Thank [redacted]

Sincerely,


Byron E. Star
Assemblyman
21st District

cc: Robert De Santis

TENTATIVE
CEASE AND DESIST ORDER

DATED 28 JULY 1987

IS FILED AS ADMINISTRATIVE RECORD NO.
N00296.000132

TENTATIVE
CEASE AND DESIST ORDER

DATED 16 SEPTEMBER 1987

IS FILED AS ADMINISTRATIVE RECORD NO.
N00296.000149