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Ser 1843.1/7023  
October 28, 1996

Dear RAB Member:

Once again, the Moffett Federal Airfield (MFA) Base Closure Team and the Community Co-Chair cordially invite you to our next Restoration Advisory Board (RAB) meeting.

Our last RAB meeting was held on October 10, 1996 at the City of Mountain View Senior Center in Mountain View, CA. The meeting summary is provided as enclosure (1).

Our next RAB meeting will again be held on the second Thursday of the month, **November 14, 1996**. Please note that this November RAB meeting will be held at the **Senior Center**. A location map of the Senior Center is provided as enclosure (2). The meeting will begin promptly at 7:00 p.m. The agenda for the meeting is as follows:

7:00-7:05 PM Meeting Overview  
7:05-7:10 PM Minutes Approval  
7:10-7:30 PM Remedial Project Managers Meeting Report  
7:30-7:50 PM Subcommittees Report  
7:50-8:20 PM Ecological Assessment (SWEA) Presentation  
8:20-8:50 PM Ecological Assessment (SWEA) Discussion  
8:50-9:00 PM Agenda/Schedule for the Next RAB Meeting

If you have any questions or comments, please contact me at (415) 244-2563, Mr. Hubert Chan of my staff at (415) 244-2562, or Mr. Robert Moss, Moffett's Community Co-Chair, at (415) 852-6018.

Sincerely,

**ORIGINAL SIGNED BY:**  
**STEPHEN CHAO**  
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BRAC Environmental Coordinator  
Moffett Federal Airfield

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**MOFFETT FEDERAL AIRFIELD  
RESTORATION ADVISORY BOARD MEETING**

**MEETING MINUTES**

**CITY OF MOUNTAIN VIEW SENIOR CENTER  
266 Escuela Street  
Mountain View, California 94041**

**THURSDAY, OCTOBER 10, 1996**

**I. INTRODUCTIONS AND MEETING OVERVIEW**

Mr. Stephen Chao, Navy co-chair, opened the meeting of the Moffett Federal Airfield (Moffett Field) restoration advisory board (RAB) at 7:10 p.m. Mr. Chao reviewed the following agenda items for this meeting:

- Minutes approval
- Remedial project managers' (RPM) meeting report
- Committee reports
- Presentation: "Stationwide Feasibility Study"
- Discussion of Stationwide Feasibility Study
- Agenda and schedule for next RAB meeting

**II. MINUTES APPROVAL**

Mr. Chao solicited comments on the minutes of the August 8, 1996 RAB meeting. There were no comments and the minutes were approved without correction.

**III. RPM MEETING REPORT**

Mr. Michael Gill, U.S. Environmental Protection Agency (EPA), provided a report of the October 2, 1996 RPM meeting held at the PRC Environmental Management, Inc. (PRC) offices in San Francisco.

Mr. Gill stated that the Navy's Site 9 source control measure treatment systems were operating continuously during the past 2 months with only minor interruptions. He reported that groundwater extraction wells were producing about 1.5 gallons per minute (gpm) each and that the storm drain system was yielding about 11 gpm. Mr. Gill noted that the Navy had submitted a draft report describing the investigation of nine former underground storage tank locations and a report detailing the pilot testing of bioventing and biosparging at Site 5. He added that the Navy was working with the San Francisco Bay Regional Water Quality Control Board (RWQCB) on basewide petroleum issues. Mr. Gill reported that the Navy had completed a surface radiation survey at operable unit 1 (OU1) and that preliminary results indicated no detections. He also noted that quarterly sampling of new groundwater monitoring wells was conducted during August 1996.

Ms. Mary Vrabel, League of Women Voters, asked whether all wells at Moffett Field were sampled quarterly. Mr. Gill responded that all wells were not sampled quarterly. He added that more than 350 wells monitor the groundwater at Moffett Field and that the regulators have worked with the Navy to gradually reduce the number of wells sampled each quarter based on the accumulated data. Mr. Bob Moss, community co-chair, noted that the current sampling of 20 wells was less than 10 percent of the total number of monitoring wells at the facility and asked whether such a small percentage was acceptable. Mr. Tim Mower, PRC, replied that fewer monitoring points were necessary because the groundwater contaminant plume beneath the western side of Moffett Field has not migrated appreciably over the past 6 to 8 years. He added that the Middlefield-Ellis-Whisman (MEW) companies have not monitored the position of the upgradient portion of this plume since 1992. Mr. Chao noted that groundwater elevations continue to be collected from all wells on a quarterly basis.

Mr. Moss stated that significantly more groundwater monitoring wells were sampled quarterly at the Page Mill site in Palo Alto. He noted that concentration changes are observed over an interval of a few years, indicating plume migration. Mr. Gill replied that geological and hydrogeological conditions were different at Moffett Field and that more frequent sampling was not justified based on the past data. Mr. Moss added that treatment systems have been installed at the Page Mill site for 4 to 5 years and that their operation, as well as the operation of an underpass dewatering sump, may increase the groundwater flow gradient and the potential for plume migration. Ms. Cynthia Sievers, Mountain View resident, asked how the frequency of sampling at Moffett Field compares to RWQCB requirements for other sites within the Santa Clara Valley. Mr. Michael Rochette, RWQCB, was not present to address this question. Mr. Peter Strauss,

MHB Technical Associates and consultant to the Silicon Valley Toxics Coalition (SVTC), suggested that the regulators investigate the details of the Moffett Field quarterly sampling program and report back to the RAB.

Mr. Strauss asked whether the sampling frequency would change after treatment systems are installed and operating. Mr. Chao responded that this was correct. Ms. Sandy Olliges, National Aeronautics and Space Administration (NASA), stated that sites typically pass through several stages. During the early, investigation stage, samples are collected frequently to understand the nature and extent of contamination. Fewer samples are needed during the feasibility study stage. Sampling frequency may increase again as treatment systems begin operation. Ms. Olliges noted that Moffett Field is in the feasibility study stage and that treatment has yet to begin. Mr. Joseph Chou, California Environmental Protection Agency, Department of Toxic Substances Control (DTSC), stated that plume boundaries and migration are included in the rationale to reduce the frequency of sampling. Ms. Sievers reiterated that the sampling frequency used at Moffett Field should be consistent with that required by RWQCB at other, similar sites.

Mr. Gill continued his RPM meeting report. He reported that the Navy completed the second round of sampling at the Iron Curtain pilot test during September 1996. Mr. Gill said that results were due about October 17, 1996 and that results from the June 1996 sampling indicated complete destruction of volatile organic compounds (VOCs) within the iron reactive wall.

Mr. Gill reported that the RPMs discussed OU1. He stated that the draft final OU1 record of decision (ROD) was prepared in June 1996, but that this document had not yet been finalized based on new information acquired during the investigation of the underground natural gas pipeline at Site 2. Mr. Gill noted that no waste was found during investigations conducted to accurately locate the pipeline and that questions involving waste volume and the potential for consolidating the Site 1 and Site 2 landfills arose from this discovery. He added that the OU1 ROD, which specifies capping as the remedy, is on hold while the RPMs discuss consolidation options.

Mr. Chao stated that the Navy excavated additional trenches in September 1996 to support discussions with the California Integrated Waste Management Board (CIWMB) and the other regulators. He reported that the excavations revealed wastes disposed in a trench and that waste existed below the water table at Site 2. Mr. Chao said that CIWMB strongly favors landfill consolidation and has applied this remedy at

Mather Air Force Base and the Army base at Fort Ord. He added that Ms. Tamara Zielinski of CIWMB was present during the excavations and stated that inert material could remain at Site 2 during landfill consolidation. Mr. Chao noted that the other regulators also were present and that all parties discussed consolidation issues after the excavation activities were completed. Mr. Chao stated that he prepared a letter confirming his understandings from the meeting and sent the letter to CIWMB and the other regulators. He reported that the regulators have, thus far, not agreed with the statements in the Navy's letter. Uncertainties in waste characterization may lead the regulators to request additional investigation and sampling. Mr. Chao noted that the use of the presumptive remedy (capping) was developed precisely in response to these uncertainties. He added that the RPMs were continuing to discuss issues related to consolidation.

Ms. Sievers stated that the consistent application of regulations to landfills at Moffett Field was important. She asked what costs would be incurred if the gas pipeline were relocated. Mr. Chao responded that the Navy had always been aware of the presence of the pipeline. He stated that Pacific Gas and Electric Company (PG&E) would be responsible for all costs if the Navy decides that the pipeline must be relocated. Mr. Chao added that the Navy will not ask to have the line relocated unless engineering issues related to construction require relocation. He said trenching conducted for detailed utility location for the cap design indicated no wastes were present near the pipeline. This new information led the Navy to reevaluate capping as a remedy and to consider consolidation of the Site 1 and 2 landfills. Mr. Gill added that landfill characterization is difficult and that EPA developed capping as the presumptive remedy as a result. Mr. Chao stated that the regulators must meet to discuss details such as sampling density and additional required investigations and then estimate project costs. He added that cost will be an important factor in the decision to consolidate the OU1 landfills.

Mr. Strauss asked whether the future value of the Site 2 area would be quantified in the cost projections. Mr. Chao responded that the potential future value of the area was not quantified. He noted that the Navy's funding priorities require him to consider the most reasonable future land use in remediation decisions. Expenditure of additional funds to achieve a less restrictive land use is not permitted. Mr. Lenny Siegel, Pacific Studies Center, stated that he believed that the most likely future use for the Site 2 area was as open space. Ms. Sievers stated that what waste is inert and what is recyclable has been determined in great detail and at great expense in many California communities. She noted that a significant effort has been made to divert even remotely hazardous waste from municipal landfills. Mr.

Chao replied that determining the portion of wastes that are hazardous during the consolidation process was one of the issues under discussion.

Mr. Siegel stated that the choice of a remedy can affect future land use, but that the cost of a remedy should not determine future land use. He asked whether the Navy expected one or multiple rounds of sampling would be required during consolidation. Mr. Chao responded that he expected multiple rounds in an excavate, sample, excavate, sample repetitive process. Mr. Siegel encouraged the regulators to consider all aspects of the project and to focus on the best overall final result given current project budget constraints. Mr. Chao replied that cost would not determine remedy selection. He added that additional time might be required to gather funds, but that the remedy would not be changed based on cost. Ms. Olliges urged use of a common sense approach to reduce the required sampling costs.

Mr. Moss asked whether the Navy had a good grasp of the contents of the OU1 landfills. Mr. Brian Werle, PRC, replied that old volumetric estimates of hazardous wastes did not appear to be accurate, but that visual identification of waste versus inert material was generally unambiguous. He stated his opinion that the Navy had a generally good grasp of the landfill contents. Mr. Siegel asked whether soil borings at the landfills were sampled. Mr. Chao responded that this was correct. Mr. Werle added that groundwater samples collected from monitoring wells installed in the waste usually indicate no contamination. Ms. Sievers asked whether the decisions made for Site 2 will affect future decisions for the other Golf Course landfills. Mr. Chao replied that the current discussions probably would affect future decisions and that additional information about the Golf Course landfills would be included in the presentation scheduled for later in the meeting.

Ms. Leslie Byster, SVTC, asked when the decision to consolidate the OU1 landfills would be made. Mr. Chao responded that he expected to decide within about 1 month whether a change would be made to the remedy and whether additional public comment was necessary. Mr. Gill added that he and Mr. Chou had estimated about 6 months would be required to reach a final ROD for OU1. Mr. Siegel asked whether funding was a concern. Mr. Chao replied that the construction funds for Site 2 were already awarded. Ms. Byster asked whether the recent trenching at Site 2 was paid for with construction funds. Mr. Chao responded that separate, investigation-related funds were used for the trenching. Mr. Strauss suggested that the Navy contact the California Department of Transportation (Caltrans) to solicit information

regarding costs and methods used by Caltrans to investigate and separate wastes at a similar site at Stinson Beach.

Mr. Strauss asked Mr. Siegel whether he knew of any mechanism that could be used to incorporate potential opportunity costs into the planning process. Mr. Siegel responded that he had never heard of doing this although the concept makes sense if future land use can be reasonably assessed. He added that such an assessment for Site 2 would be difficult. Mr. Siegel continued that he favored expenditure of a minimal cost for an added benefit, but that the same benefit may not be acceptable at a much greater cost. Dr. Jim McClure, Harding Lawson Associates and consultant to the MEW companies, requested that the Navy provide details from the excavation activities such as trench logs and locations. Mr. Chao responded that Mr. Don Chuck, Navy, had prepared this information and that the data would be available in about 1 month.

Mr. Gill continued his RPM meeting report. He stated that the draft final stationwide feasibility study (FS) report was scheduled to be submitted on November 1, 1996. Mr. Gill noted that the regulators were reviewing the draft final site-wide ecological assessment (SWEA) report. He added that all parties essentially agreed on which areas were affected, but that how to address these areas will be the issue of concern for the stationwide FS report. Mr. Gill said issues related to remediation versus preserving habitat and potential impact to burrowing owls will be concerns. He added that NASA and the Navy were working with Dr. Lynne Trulio of San Jose State University to compare Moffett Field's burrowing owl population to other populations in the South Bay area. Ms. Olliges stated that she had been in contact with Dr. Trulio. She reported that Dr. Trulio's opinion was that Moffett Field's burrowing owl population showed good reproductive success but that natural variability among populations was very great. Consequently, Dr. Trulio did not believe that a statistically significant comparison could be made between Moffett Field's population and other sites. She noted that too many different stressors exist on the owl populations and that there are too many variations in natural site conditions to determine if chemicals in the environment at Moffett Field had affected the burrowing owl population.

Mr. Gill reported that the Navy was conducting a bench-scale test of ozone/peroxide oxidation in conjunction with the design of the west-side aquifer treatment system (WATS). He noted that preliminary results indicated approximately 95 percent destruction of the contaminants by the oxidation technique. Mr. Gill stated that the Navy would treat the water discharged from the oxidation system with an air stripper.

Mr. Chao added that the change in the WATS design is that granular activated carbon would no longer be necessary to treat vapor or liquid effluent from the air stripper. Mr. Strauss asked whether air emissions from the air stripper would be minimal under the new design. Mr. Chao responded that air emissions were expected to be below Bay Area Air Quality Management District (BAAQMD) standards. Dr. McClure added that Siltec Corporation was studying a similar ozone/peroxide system for use in source control operations at its site south of U.S. Highway 101. Mr. Strauss asked whether ultraviolet (UV) light was also studied as an oxidant. Mr. Chao replied that UV was studied, but provided only a minimal increase in system efficiency for a large increase in power consumption. Mr. Gill noted that systems employing UV oxidation at Lawrence Livermore National Laboratory had experienced operating problems.

Mr. Gill continued his report by stating that the geographic carveout agreement between the Navy and the MEW companies was in progress. He noted that NASA and the MEW companies were preparing a similar agreement and that the Navy was awaiting the completion of this NASA-MEW agreement. Ms. Olliges added that she received a recent draft yesterday and that the agreement was near completion. Mr. Gill stated that he proposed including treatment system information in the Navy's quarterly reports. Ms. Olliges stated that NASA was planning to install two groundwater monitoring wells along Lindbergh Avenue. She added that NASA was preparing a draft removal action work plan to address free product near Tank 1.

#### **IV. COMMITTEE REPORTS**

Mr. Chao asked the committee chairs to deliver their reports. Dr. McClure reported that the technical, historical, and educational (THE) committee met on October 9, 1996. He stated that the committee discussed issues related to OU1 and Site 2 and contaminants in wetland areas addressed by the stationwide FS. Dr. McClure stated that these issues have been or would be addressed during other portions of the meeting.

Ms. Byster asked whether there was a report from the MEW all parties meeting. Mr. Chao responded that no new significant issues were raised at the September 12, 1996 all parties meeting.

There were no reports from the cost, organizational, or communications, media, and outreach committees.

## V. STATIONWIDE FEASIBILITY STUDY PRESENTATION AND DISCUSSION

Mr. Werle presented information about the stationwide FS at Moffett Field. Mr. Werle discussed the purpose and scope of the stationwide FS. The stationwide FS was prepared after the stationwide remedial investigation (RI) and evaluates cleanup alternatives to address potential risks to human health and ecological receptors. The stationwide FS evaluates the cleanup of contaminated sites that are not included in other OUs, for example, the soils and sediments of wetland areas in the northern portion of Moffett Field and Golf Course Landfill 2. Potential cleanup areas are based on human health and ecological risk assessments as well as California landfill closure regulations. Potential risks to human health were noted in the stationwide RI from exposure to polychlorinated biphenyls (PCBs) in areas including the northeastern corner of the Eastern Diked Marsh, the inlet to the stormwater retention pond, and two locations at the Northern Channel. Potential risks to ecological receptors were identified in the SWEA and included risks from exposures to pesticides and PCBs in approximately the same areas.

Ms. Byster asked about the exposure pathways for ecological receptors. Mr. Werle responded that benthic invertebrates could be exposed through direct contact with sediments. Other organisms could be exposed through consumption of these invertebrates or other organisms that feed on them throughout the food chain. Mr. Werle added that the SWEA found no increased risks from exposure to surface water. Mr. Paul Lesti, Mountain View resident, asked how humans were exposed. Mr. Werle replied that recreational usage, such as walking and jogging, was responsible for most potential human exposures. Mr. Siegel asked whether the southern boundary of the diked marsh was a physical boundary or only the separation between Navy and NASA property. Mr. Werle replied that it is a physical boundary that represents the edge of the marsh. Mr. Siegel asked whether NASA had conducted a separate investigation of the marsh. Mr. Werle responded that the Navy and NASA had worked together in the SWEA to incorporate all of Moffett Field.

Ms. Sievers asked whether a technical advisory committee had reviewed the SWEA. She suggested that experts in the South Bay area, perhaps from Stanford University, the U.S. Geological Survey, or San Jose State University, might be appropriate. Mr. Werle responded that the SWEA and stationwide FS reports are intended to stimulate such reviews and discussions. Ms. Vrabel asked whether risks from contaminants appeared to be distributed throughout the site or in localized "hot spots." Mr. Werle replied that such a distinction is difficult to quantify because of the uncertainties in the calculations of ecological risk. He noted that historical operation of the stormwater system and areas of higher risk coincide. For example,

relatively higher risks are indicated at discharge areas such as the Northern Channel, the Eastern Diked Marsh, and the inlet to the stormwater retention pond.

Ms. Sievers asked whether a comparison to other habitat areas around the bay had been made. Mr. Werle responded that the ecological scientists had used information from various sources from the bay area. Mr. Lesti asked whether human exposure through the food chain was considered. Mr. Chao replied that the human health risk assessment did evaluate this potential pathway. Mr. Moss asked about the strategy to complete the stationwide FS report and how significant risks would be identified. Mr. Werle agreed that selecting the criteria to identify risk would be a critical problem for the stationwide FS. He added that ecological risk assessment is a developing field and so quantifying risks is not as simple as for a human health risk assessment. Mr. Chao stated that the focus is on special status species because insufficient research data are available to evaluate all species. Mr. Gill noted that the California Department of Fish and Game may consider requiring mitigation (replacement of habitat) if remediation destroys habitat. Mr. Werle added that habitat destroyed by remediation would be replaced and that mitigation would be necessary only during the construction period.

Ms. Vrabel asked whether the site conditions that resulted in the deposition of PCB-bearing sediments have been changed. Mr. Chao responded that this was correct. Ms. Vrabel added that clean sediment was, therefore, covering previous contaminated sediment and reducing the potential exposure to organisms. Mr. Werle stated that this situation is being considered in the FS process. Mr. Siegel asked whether the Navy had considered phytoremediation (using plants for remediation). Mr. Werle responded that this technique is more applicable for metals than for remediation of pesticides and PCBs. Mr. Siegel noted that information related to opening the stormwater retention pond to tidal influence via Stevens Creek would be useful for future decisions concerning Moffett Field and encouraged the Navy to include this information in the stationwide FS report.

Mr. Werle stated that the next submittal of the stationwide FS report will be a draft final version, but that it would be considered a draft because of the many changes made since the previous submittal. Ms. Byster asked for the schedule for the report. Mr. Chao responded that the report was scheduled to be submitted on November 1, 1996. Mr. Strauss asked what comment period would be applicable. Mr. Gill replied that a 45-day comment period would apply. Dr. McClure commented that representatives from all necessary regulatory agencies should be involved in the decision process as early as possible to avoid conflicts among

regulators that may occur later in the process. He described an example at Fort Ord that resulted in a significant delay in project progress. Mr. Chao responded that all applicable agencies were involved.

Mr. Siegel noted that the technologies for remediating marine sediments require additional research and development to be effective. He suggested that considering an interim remedy may be advisable. Ms. Sievers stated that the portion of San Francisco Bay south of the Dumbarton Bridge is a unique region that experiences little tidal flushing. She added that many agencies, for example the South Bay Dischargers Association, have studied this area and asked whether information from these agencies was used in evaluating conditions at Moffett Field. Mr. Werle replied that the Navy was working with RWQCB to obtain this input.

Mr. Siegel asked whether other areas on the facility, such as the bunker areas, had been considered for wetlands areas to satisfy potential mitigation requirements. Mr. Werle responded that the Navy has contacted the Department of Fish and Game to obtain the formula that would be applicable to estimate the area for mitigation. He added that few other sites at Moffett Field would be likely candidates for wetlands. Ms. Olliges stated that the bunker areas are actively used and would not be suitable for wetlands. Mr. Strauss asked whether metals were considered in the ecological risk evaluation. Mr. Werle replied that metals are evaluated against regional values and that the imported fill present over much of the northern portion of the station was difficult to evaluate. He added that RWQCB provided a document containing regional concentrations of chemicals in sediments. Mr. Strauss asked whether the stationwide ROD would encompass the entire facility. Mr. Chao responded that this was correct. Mr. Gill added that the stationwide ROD may incorporate the existing RODs by reference.

Mr. Werle completed his presentation by describing the format of the stationwide FS report. The report will contain a summary of the human health and ecological risk assessments and an evaluation of applicable or relevant and appropriate requirements. Remedial action objectives will be identified and appropriate remedial technologies will be grouped into alternatives and compared. Remedial alternatives for sediments will include cleanup to various risk levels presented in the SWEA, and a different level of ecological monitoring will be proposed for each cleanup alternative. More aggressive cleanup alternatives will require correspondingly less ecological monitoring. Remedial alternatives for Golf Course Landfill 2 will include no action and a multilayer cap similar to that proposed for OU1. Technologies currently under consideration for sediment remediation include excavation with off-site disposal, or on-site treatment.

Potential treatment technologies include low-temperature thermal desorption, dechlorination, vitrification, enhanced biodegradation, and stabilization.

#### **VIII. AGENDA AND SCHEDULE FOR NEXT RAB MEETING**

Mr. Chao stated that the next RAB meeting was scheduled for November 14, 1996. Ms. Byster suggested that the RAB reschedule the November meeting because of a conflict with the SVTC annual fund raising event. Mr. Chao solicited the members' opinions on canceling the November meeting. Mr. Siegel responded that he believed that the November meeting was necessary. Dr. McClure added that the November 14, 1996 meeting would be a timely opportunity for the RAB to provide input on the stationwide FS report which is scheduled to be submitted on November 1, 1996. The RAB voted on the next meeting date and resolved to keep the meeting on November 14, 1996. Dr. McClure reminded the members that the THE committee would meet on November 13, 1996. He suggested asking a Department of Fish and Game representative to attend the next meeting. Mr. Chao closed the meeting at 9:15 p.m.