

TELEPHONE CONVERSATION RECORD



3736

ENVIRONMENTAL PROTECTION

DATE 6/29/98 98 JUL -- TIME PM 2: 59 1015 X AM PM

X TO FROM Paul Smith

COMPANY Alameda County Public Works Agency, Clean Water Program

ADDRESS 951 Turner Court PHONE (510) 670-5236
Hayward, CA 94545-1395 FAX

PROJECT NAME Clarks Home and Garden, 23040 Clawiter Road

PROJECT NO. 2611.01

COPIES TO:
Bob Price
Paul Smith, Alameda County
Brian Oliva, Alameda County

PAGE 1 OF 1

SUBJECT: Drums stored at the 23040 Clawiter Road site

Called Paul Smith about his recent inspection of the site and to discuss his concerns about the drums stored at the site. He stated that he had observed eight 55-gallon drums and four 5-gallon drums at the site. He indicated that he has three concerns regarding the drums: 1) The drums are stored in an unsecured, unpaved area along Saklan Street. 2) Some of the drums are labeled and some are not labeled. Based on the dates it appears to him that these drums have been stored at the site for some time, and he was concerned that they may have been forgotten. 3) When the drums are removed removal of diesel- stained surficial soil resulting from current facility operations (fueling of the skip loaders) should also be performed, if possible.

I explained that Geomatrix has worked on behalf of Bob Price in performing fuel leak investigation activities at the site. The work is under the oversight of Brian Oliva (510-567-6737) of Alameda County Health Care Services Agency. Because the investigation activities are not yet complete, the investigation-derived wastes (e.g., soil cuttings, purge water, and cleaning water) have been stored at the site with plans to test and dispose of these wastes at the conclusion of investigation activities.

We discussed the situation and agreed that it is appropriate proceed with the drum disposal now. I stated that we would start the process, which will consist of the following: submitting a bid for testing and disposal to Bob Price; after approval, we will sample the drums and submit the samples for lab testing to determine disposal options; and, finally, proceed with the disposal. We also agreed that the drums should be relocated to a more secure and paved area of the site while this process is occurring.

Paul Smith
670-5236

(415)
743-7026

Drums RECORDED BY Ross Steenson *Ross Steenson*

Comments Re: brief review of report dated 6/11/97

Call Sho matrix to discuss:

Free-product diesel? Where is it coming from?

PNA's - Did they complete analyses? This was a req't.
for soil & groundwater

Chester Clark

Kenneth Clark

Bob Price - Brother-in-law

↳ 7/8/97 - Spoke w/ Butch Bosa (510) 676-7910
who said he intends to purchase the
property. He indicated Chester Clark has
passed away. Bob Price (Chester's son-in-law)
is still managing details of invest. &
submittals to the Fund

9/17/97

on phone to Conrader
left message

re site

following review of the site, felt
we will meet (Ron S)
re site

#3736

01/24/97

Returned call to Ross ^{Steenerson} Steenerson w/ Geomatrix 415-434-9400
left msg.

02/18/97

Discussed PNA analyses w/ Ross Steenerson & field work scheduled tomorrow. Told him to analyze for PNA's only where an exposure route is expected & a risk is where a risk should be evaluated.

3/6/97

Call from Bob Price. He is faxing new address & RP info to us attn: Brian Oliva. I told him I had only looked at the 1/11/97 Geomatrix report briefly & Brian Oliva would be following up w/ next course of action for this site. I told him that health risk looks low due to BTX cone. & landuse. However, high cone. of TPH (possibly free product) on the site may need to still be addressed along w/ confirming plume stability over time (this may require add'l wells since site only has one)

Phone Log (23040 Clawiter Rd.)

9/13/96

Left msg for Tom Graf (415) 434-9400 to call Re: update on investigations of this site.

- 1) Proposed field work approved by J. Peacock in 7/31/96 letter. Completed yet? Results?
- 2) Thoughts on collecting cap. fringe soil samples for analysis.
- 3) Start sampling gw & soil samples for 8270's esp. interested in benz(a)pyrene & naphthalene.

Tom Graf returned call & we discussed items above. We agreed to collect a cap. fringe soil sample from proposed boring to be located ^{rimmed} west of USTs. This sample location & MW-1, they will run 8270's. They are in limbo right now waiting to hear from RP - RP is waiting on Cleanup Fund Reimbursement/ approval(?).

9/13/96

Left msg ~~from~~ for Bob Price (RP) & Patrick Wheeler (CUF) to call Re: status of hold up.

9/17/96

Spoke w/ Patrick Wheeler who said he has rec'd the fax from Bob Price but several items were missing: workplan, ^{approval} letter from LOP, etc.. Pat Wheeler said he would try to contact Mr. Price and he did send a letter out to him recently.

Re: same

9/17/96

Called Bob Price & ~~gave~~ gave him P. Wheeler's phone #

Phone Log (23040 Clavitor Rd)

- 6/6/95 Tom Graf called. Will be doing gradient determinations this week. Planning to complete Geoprobe study the next 1-2 weeks. Told him we would need a letter requesting an extension. He asked me to call Bob Price.
- 6/7/95 Left a msg for Bob Price to call me
- 6/9/95 Bob Price called. He's sending a letter requesting an extension
- 9/25/95 Bob Price called. Has submitted P/W to Fund. Now is submitting current WP to Mr Smith ~~at~~ w/the Fund for review
- 10/17/95 Plan to start next phase of work 1st week of Nov. Geomatrix will send out letter of confirmation
- 5/13/96 spoke w/ Tom Graf w/ Geomatrix who said they had completed proposed work in November & were not able to define the plume - had TPH_{g,d} & no a prop. line. ~~Decided~~ Decided not to submit a report before meeting w/ us to propose a new w/p for defining/assessing the site. Is working w/the Cleanup Fund to get approval. Told him I needed a date - he said he would call Bob Price & call me back w/in a week.

Add'l Comments for Geomatrix

6/2/95

→ Send standards for diesel & gas chromatogram &/or a discussion that it was confirmed that JP analysis has identified d & g & we will proceed w/ WP dtd 4/15/94.

→ W/P to be implemented by June 10th* - report due by July 25th.

6/5/95

→ Fingerprint assured client contamination is from on-site USTs.

- Gradient Determination

→ Elizabeth Wells, ^{new} Project Manager w/ Geomatrix

→ Bob Price's Phone # (503) 476-9977

Phone Log (23040 Clairville Rd)

→ (541) 303-476-9977

4/17/95

Bob Price left a message on Adeech's VM on 4/14. He contacted Adeech directly (Monday) 4/17 to say that he rec'd our letter dated 4/10/95 and has spoken to his consultant Geomatrix. He stated they have been doing quarterly monitoring all along. I told him, as stated in our letter, the last qmr we have is 12/93. He indicated he would have all reports forwarded to me immediately as well as the work completed by Geomatrix (fingerprint analysis). I told him I would contact him as soon as I had a chance to review the reports.

4/17/95

Tom Graf w/ Geomatrix called to say that they are currently researching this case regarding qmr's completed & pending w/p. He will call us back by the end of this week.

6/2/95

Left msg w/ Tom Graf w/ Geomatrix to call me to discuss status of this site. See notes

6/5/95

Spoke w/ Tom Graf w/ Geomatrix who said fingerprint analysis was to confirm that contaminants were from on-site USTs for client's assurance. He is tracking down Plain Tech Services' QMS for the site. Will get back to us on gradient determinations & w/p implementation date. Told him if past June 10th then we would need a letter

Phone Log (23040 Claviter Rd)

3/15/95

Returned call/left a message w/
Dexter Feldman of Geomatrix (415) 434-9400
regarding the status of this site
→ w/p dtd 4/94 not yet implemented
→ No gwm reports since 12/93.
→ Told him I would complete a
thorough review of this file
either on 3/17 or on 3/27.

4/10/95

Left a msg. w/ Dexter Feldman of Geomatrix to
call me to discuss this site.
→ Geomatrix submitted a w/p April 1994 &
we have no record that this work was
started or completed
→ We have no QMR or data since 12/93.
R w/p stated that Plain Tech was conducting
QM for MWI but we have no record of
this

4/10/95

Mrs. Feldman of Geomatrix returned my call.
He said Geomatrix completed the fingerprint
analysis in 10/94 & results indicated
degraded diesel & gas which would be
attributable to the former on-site USTs.
He stated that they do not have gmr
prepared by Plain Tech.

I told him I would be writing the
RP's a letter since they have not returned my
call.

PHONE LOG (23040 Clawiter Rd.)

11/8/93 cont... she advised that Clark apply soon since his inheritans will not be able to qualify for the Fund unless his application has already been submitted.

2/29/94 Approved extension of due date for work plan to April 15 '94.

9/2/94 Chester Clark (503) 476-1588

Mr. Clark confirmed that he has already reapplied for the State Trust Fund under his son's name. He also confirmed that quarterly monitoring of fuel fingerprinting would continue at this site.

9/6/94 left message for Donna Turcotte re how long it would take to reassess Mr. Clark's application. ^{State Trust Fund}

3/3/95 Spoke w/ Chester Clark ⁵⁴¹ (503) 476-1588

regarding status. He said I would need to speak w/ his son-in-law, Bob Price. ^{Deliver from Bob Price call me} Mr. Clark basically said they have ~~to~~ not done any work toward the w/p which was due to this office on 3/1/94. They were trying to get reimbursed for past work through their LOC w/ State; however, the State has asked them for documentation (i.e. contractor's lic. # etc.) which they have not been able to generate since many of them he gone out of business. I reminded him that they need to pursue their Clean-up w/ due diligence in order to get their LOC.

→ He wanted to know how close they were to closure or also wanted to know status of wells at neighboring site. I told him I would check.

PHONE LOG (23040 Clawater Rd.)

10/28/93 left message w/ Blessie Torres regarding status of State Trust Fund - Juliet Stein

11/8/93 Bob Prier, relation to Clark, (503) 476-9977
+ Juliet Stein

Mr. Prier called in response to the letter requiring them to do work & stating that they had not applied for the State Trust when they said that they did.

Mr. Prier stated that they had prepared the Trust Fund package but were told that they wouldn't qualify because they did not reside in California. I told him I would check this out w/ the State. I explained to him the reasons for requiring the work, and the fact that the alleged jet fuel at Alhambra has not been confirmed. He requested that he be contacted re: State Trust Fund issue.

Bob Prier
537 Hidden Valley Rd.
Grants Pass, Oregon 97527

11/8/93 Blessie Torres, (916) 227-4535 + Juliet Stein

Ms. Torres stated that just because Clark is not a residence of California, doesn't mean he can't apply. He will probably be classified as D due to his out-of-state residency. She stated that 15% of what the State issues to Class A + B sites must go to Class D sites per year.

Pave Log

12/15/93 Deane Phillips, Tamarack, Inc
a. Fulton St. (408) 297-6969

I called to request Tamarack to include gradient wgs from the adjacent property in the quarterly reports. Mo Phillips stated that the purge water is in drums on site. (I need to request documentation from Clark for where past purge water was disposed at).

Mo Phillips stated that the g.w. contaminant levels have gone down since the excavation on the Alhambra site (Talk to Hugh Murphy about Alhambra's requirements to delineate extent of contamination.) (Check w/ Bob Price to see whether they applied for Fund).

Ph. & Conversation - 5/20/93

Christine Connelly, Alhambra Water
v. Juliet Shum
RE: Clark's Home Boarding

Mrs. Connelly stated that they placed four monitoring wells on the Alhambra site, located adjacent to the Clark's site, and detected both gas and a heavy hydrocarbon tentatively identified as jet fuel. She wants to share data w/ Clark's site to try & figure out source of jet fuel contamination.

A draft report detailing site work at Alhambra will probably be completed by June 7, '93. After that pt. Alhambra wishes to arrange a meeting w/ Hugh Murphy & myself to discuss the results.

5/18/93

Bob Price called regarding the installation of wells near or on Clark's Home + Garden property. He apparently had spoken to someone by the name of Christine Connelly.

Bob Price's ph#: (503) 476-9977
Christine Clark's ph#: (503) 476-1588

Bob Price called me later and gave me phone # of Christine Connelly → (818) 585-1289. Apparently, she represents Alhambra Water and wishes to monitor the well at the Clark's site.

Phone Conversation 1/19/93

Hugh Murphy, Hayward Fire Dept
(510) 293-5454
and Juliet Shui

RE: Clark's Home & Garden, Hayward

Mr. Murphy stated that he sent a letter to Alhambra Water, neighboring Clark's, to begin further investigations into soil and groundwater contamination at the site. He said that Alhambra is in the process of trying to sell the property, so they will probably be expeditious in their investigation/ remediation requirements.

I asked if he could have Alhambra letters copy me on all correspondence and reports.

I updated Mr. Murphy on the status of Clark's investigations.

RE: Clark's Home & Garden, Hayward 10/21/92
From: Bob Price, representative for Clark's
(503) 476-9977
To: Juliet Shier

Mr. Price requested that an address and phone number for the Trust Fund. Also, he asked whether Ms. Shier had looked into the neighboring contaminated sites. She said that she spoke to Eddy So, NWQCB, about getting Alameda Water to conduct further investigations at their site in response to the past obscured release there.

Ms. Shier recommended that Mr. Clark conduct a file search at the Hayward Fire Dept. for Olivia De Silvas wells. She also requested a financial statement to try and determine a reasonable schedule for compliance.

10/14/92

Eddy So, RWQCB & Juliet Skin
RE: Clark's 23040 Claveter Rd, Hayward

Mr. Skin asked whether Mr. So could do anything about getting Alhambra Water to conduct investigations since an observed release resulted from their OST. Mr. Skin stated that Mr. Clark is financially strapped, according to Bob Price, and that he feels it is unfair that he conduct investigations when Alhambra doesn't have to.

Mr. So stated that it seems to him that Clark's needs to remediate the soil, which ^{appears to be} the source of contamination, otherwise they'll be monitoring forever.

Mr. So said that he would speak to the Hayward Fire Dept to see what's going on, but he recommended that Clark's continue making a diligent effort to conduct further investigations.

Mr. Skin stated that it would probably take awhile since Clark's is financially strapped & it may be a greater threat to the area if action is postponed.

From: Sheila Chrisley
to: Juliet Stein

10/8/92

Tunatach, Inc

Ms. Chrisley stated that Tunatach, Inc. had done a file search for Mr. Clark however, no figures w/ monitoring well locations were obtained.

Ms. Chrisley stated that Tunatach is nearing the end of its contract w/ Mr. Clark.

Ms. Chrisley stated that ~~Mr. Price~~ she will call me next week to give me Mr. Bob Price's phone number.

DATE 9/24/92

CONTACT LOG

FROM: Bob Price AFFILIATION: _____
TITLE: _____ PHONE: _____
TO: Juliet Shin AFFILIATION: _____
TITLE: _____ PHONE: _____
RE: Clark's Home & Garden, 23040
Claviter Rd, Hayward

Mr. Price is speaking for Mr. Clark, the owner of the property. Mr. Price stated that Mr. Clark has very little money, not even enough to install 2 additional wells. According to Mr. Price, Mr. Clark would have to save for 2 years before being able to spend \$7,000 on the installation of 2 additional wells. Additionally, Mr. Price stated that Mr. Clark has already spent \$40,000 on work related to investigations at the site. Ms. Shin stated that Mr. Clark could apply for the Trust Fund and be reimbursed for the amount he spent.

Mr. Price stated that it wasn't fair that Mr. Clark is being made to do further work at the site when the neighboring sites, that are huge corporations, are not even though there is extensive soil cont. at those sites. The sites Mr. Price named were Alhambra, Oliver De Silva, and National Board.

Ms. Shin stated that if wells at Oliver De Silva show that g.w. cont. are not migrating to sit Mr. Clark's site, then he is ultimately responsible.

Mr. Price said that if they install add. wells & find that contamination is coming from

DATE 8/20/92

CONTACT LOG

FROM: Hugh Murphy (Returned call) AFFILIATION: Hayward Fire Dept.
TITLE: _____ PHONE: _____
TO: Julius Shin AFFILIATION: Alameda County
TITLE: _____ PHONE: (510) 271-4530

RE: STID 3736 - Clark's Home + Garden, 23040
Clawiter Road, Hayward, California

Mr. Shin told Mr. Murphy that the R.P. of the above site refuses to install additional wells at his site because he feels that the groundwater contamination observed in his well is due to the contaminated sites in Hayward, Mr. Murphy's jurisdiction. Mr. Murphy stated that his list of contaminated sites in Hayward show the Alvin De Silva site, located 22991 Clawiter, which is downgradient of the above site. Also, the Alhambra Water site, located at 22990, is cross-gradient to the site. No other contaminated sites are in close proximity to the site, except for Barbuley Farms at 23555, which is located in Alameda County's jurisdiction.

Mr. Murphy stated that both Alhambra and Alvin De Silva have not done much investigative work on their sites. Alvin De Silva recently submitted a work plan, which the Fire Dept approved. However, Mr. Murphy does not know what the status is of implementing the work plan.

Mr. Murphy stated that there really are no contaminated sites upgradient of Clark's site, only residential.

DATE 6/26/92

CONTACT LOG

FROM: Juliet Shin AFFILIATION: Alameda County
TITLE: _____ PHONE: (510) 271-4320
TO: Suzila M. Christley AFFILIATION: Terratech, Inc.
TITLE: _____ PHONE: (510) (408) 297-6969
or (408) 372-3716
RE: ST11) 3736- Clark's Home & Garden, 23040 Clawiter
Road, Hayward, California

Ms. Shin called to let Terratech know that their recommendations to collect water level measurements & samples ~~would~~ from neighboring sites would be okay. Ms. Christley stated that, although the owner of the property initially agreed w/ Terratech's recommendations, he does not want to spend any more money on investigations at the site, other than the quarterly monitoring, for several reasons:

- 1) Neighboring sites, such as Oliver DeSelva, located at 22991 Clawiter, and Alhambra Water, located at 22990 Clawiter, both have known hydrocarbon contamination at their sites, but yet they have not been made to do any further investigations or remedial work by Hayward Fire Dept. Therefore, he doesn't feel he has to either.
- 2) Additionally, Burbuley Farms, located at 23555 Saklan is located upgradient of the site and is known to have contamination problems.

3) Ms. Christley said that she wishes to monitor from existing wells, but none of the neighboring wells are w/in 100 feet of the former UST. There are some wells w/in 200 feet. She was wondering if they could use those wells.

Ms. Shin stated that the majority of files for this site were missing and requested that Terratuck send copies of the past reports.

Ms. Shin asked Ms. Christley whether or not the property owner has applied for Trust Fund money. Ms. Christley stated that although the property owner has spent quite a bit of money, he has not yet spent \$10,000 on cleaning up the site yet, just on tank removal, monitoring well installation, and quarterly monitoring. The property owner is retired and was planning to use money from the purchase of this property for retirement. So he does not have much money.

IMPORTANT MESSAGE

FOR Juliet
 DATE 10/21 TIME 11:52 A.M. P.M.
 M. Bob Christ Price
 OF 503-476-9977

PHONE AREA CODE NUMBER EXTENSION

TELEPHONED	<input checked="" type="checkbox"/>	PLEASE CALL	
CAME TO SEE YOU		WILL CALL AGAIN	<input checked="" type="checkbox"/>
WANTS TO SEE YOU		RUSH	
RETURNED YOUR CALL		SPECIAL ATTENTION	

MESSAGE 15: Chester Field.
about 1:15 pm

SIGNED EMS
 LITHO IN U.S.A.

To PL
 Date 12/10 Time 11:40
While You Were Out
 M. Bob PRICE
 of _____
 Phone 714/778-9336
 AREA CODE NUMBER EXTENSION

TELEPHONED	<input checked="" type="checkbox"/>	PLEASE CALL	<input checked="" type="checkbox"/>
CALLED TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		URGENT	

RETURNED YOUR CALL

Message NOTE. HE IS
DO THE PAY
PHONE WAITING
Chester Clark: 5 hours

Operator _____

IMPORTANT MESSAGE

FOR Pam
DATE 8-19 TIME 1:15 A.M. P.M.
M Shella
OF Terra Tech
PHONE 408 297-6969
AREA CODE NUMBER EXTENSION

TELEPHONED		PLEASE CALL	<input checked="" type="checkbox"/>
CAME TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		RUSH	
RETURNED YOUR CALL		SPECIAL ATTENTION	

MESSAGE w/ questions re. BLC
at 2855 Saklan Rd

SIGNED _____
LITHO IN U.S.A.

IMPORTANT MESSAGE

FOR TP
DATE 10/17 TIME 4:00 A.M. P.M.
M Chester Clark
OF _____
PHONE 503 476-1588
AREA CODE NUMBER EXTENSION

TELEPHONED		PLEASE CALL	<input checked="" type="checkbox"/>
CAME TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		RUSH	
RETURNED YOUR CALL		SPECIAL ATTENTION	

MESSAGE Re: 2304 Cluiter Rd.
Hayward

-D letter received
closure plan mailed
10-19-88

SIGNED _____
LITHO IN U.S.A.

IMPORTANT MESSAGE

FOR Pam
DATE 10/8 TIME 2:00 A.M. P.M.
M Valentina
OF URIAH geology
PHONE 455-4991
AREA CODE NUMBER EXTENSION

TELEPHONED	<input checked="" type="checkbox"/>	PLEASE CALL	<input checked="" type="checkbox"/>
CAME TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		RUSH	
RETURNED YOUR CALL		SPECIAL ATTENTION	

MESSAGE Re: 1735 Webster St,
Alameda

may 10/8

SIGNED S.S.
LITHO IN U.S.A.

To Ham

Date 1-14-91 Time 10:25

While You Were Out

M Bob Price

of _____

Phone 209-578-2388

AREA CODE	NUMBER	EXTENSION
209	578	2388

TELEPHONED	PLEASE CALL	<input checked="" type="checkbox"/>
CALLED TO SEE YOU	WILL CALL AGAIN	<input type="checkbox"/>
WANTS TO SEE YOU	URGENT	<input type="checkbox"/>

RETURNED YOUR CALL

Message pls try to call
back w/in
half an hour

Operator _____

CARDINAL 4C200

IMPORTANT MESSAGE

FOR TP

DATE 3/8 TIME 8:40 AM P.M.

M Butch Voss

OF Voss Materials

PHONE 490-0310

AREA CODE	NUMBER	EXTENSION
490	0310	

TELEPHONED	PLEASE CALL	<input checked="" type="checkbox"/>
CAME TO SEE YOU	WILL CALL AGAIN	<input type="checkbox"/>
WANTS TO SEE YOU	RUSH	<input type="checkbox"/>
RETURNED YOUR CALL	SPECIAL ATTENTION	<input type="checkbox"/>

MESSAGE re: Chester Clark's Home
and garden

SIGNED _____

LITHO IN U.S.A.

TOPS FORM 3002S

IMPORTANT MESSAGE

FOR TP
 DATE 1/5 TIME 1:00 A.M.
 M. George Johnston
 OF R.W. Johnston & Son
 PHONE 261-9424
AREA CODE NUMBER EXTENSION

TELEPHONED		PLEASE CALL	<input checked="" type="checkbox"/>
CAME TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		RUSH	
RETURNED YOUR CALL		SPECIAL ATTENTION	

MESSAGE RE: NOV received
Clark's Bldg
23040 Claviter Rd.
Hayward
Report coming in from
1-6-89 JFP

SIGNED _____
 LITHO IN U.S.A.

IMPORTANT MESSAGE

FOR Tom
 DATE 1-7 TIME 11:05 A.M.
 M. HARRIS
 OF DA'S OFFICE
 PHONE _____
AREA CODE NUMBER EXTENSION

TELEPHONED		PLEASE CALL	<input checked="" type="checkbox"/>
CAME TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		RUSH	
RETURNED YOUR CALL		SPECIAL ATTENTION	

MESSAGE _____

SIGNED _____
 LITHO IN U.S.A.

IMPORTANT MESSAGE

FOR Pam
DATE 6-11-90 TIME 8:07 A.M.
M Hugh Murphy
OF _____
PHONE 784-8695
AREA CODE NUMBER EXTENSION

TELEPHONED	PLEASE CALL	<input checked="" type="checkbox"/>
CAME TO SEE YOU	WILL CALL AGAIN	<input type="checkbox"/>
WANTS TO SEE YOU	RUSH	<input type="checkbox"/>
RETURNED YOUR CALL	SPECIAL ATTENTION	<input type="checkbox"/>

MESSAGE •150 DDT
•045 ODE
195

SIGNED MNC