MEMORANDUM

TO:       Elly Daoud
          Hazardous Substances Engineer
          Sacramento Office of Permitting
          Hazardous Waste Management Program

FROM:    Jeff Brown, PG #7757
          Sacramento Geologic Services Unit Chief
          Geological Services Branch
          Brownfields and Environmental Restoration Program

REVIEWER:    Lora Jameson, PG #8134
              Senior Engineering Geologist
              Sacramento Geological Services Unit (GSU)
              Geological Services Branch

DATE:        April 24, 2017

SUBJECT:    Part B Permit Application and Monitoring Plan
            Burro Canyon, Open Burn/Open Detonation (OB/OD) Facility
            China Lake Naval Air Weapons Station (CLNAWS)
            Ridgecrest, Kern County, California 93555
            Project No. 25025/100038-33/205-HWMP/20039101

DOCUMENTS REVIEWED

1. OB/OD Facility Permit Renewal Application, China Lake Naval Air Weapons Station,
   prepared by CLNAWS, dated March, 2017.

2. Monitoring Plan for the Burro Canyon OB/OD Facility at the Naval Air Weapons
   Station, China Lake, CA. Final, prepared by China Lake Environmental Division,
   March 2017.

The Sacramento GSU of the Department of Toxic Substances Control (DTSC) reviewed
the above-referenced documents and prepared the following comments. If you have any
questions regarding this memorandum, please contact me at (916) 255-6532 or
jeff.brown@dtsc.ca.gov.

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SCOPE OF REVIEW

GSU was asked to conduct a technical review of Sections II and XI of the draft and final Part B Permit Application for the Burro Canyon OB/OD unit and the draft final and final versions of the Burro Canyon OB/OD soil and groundwater monitoring plan (Monitoring Plan). The purpose of this review was to determine if the information in the final permit renewal application and the Monitoring Plan is sufficient to comply with the following portions of Title 22 of the California Code of Regulations (CCR):

1. The Part B permit application content requirements for miscellaneous units set forth in §66270.23 et seq; and

2. The water quality and unsaturated zone monitoring and response program requirements for miscellaneous units set forth in §66264.600 et seq (Article 16)

CONCLUSION

GSU issued memoranda of comments dated November 3, 2015 and July 7, 2016 addressing the technical deficiencies in the draft permit application and draft final Monitoring Plan. GSU has determined that all technical comments submitted to CLNAWS in these memoranda and in follow-up email exchanges with the facility have been addressed in the Final Application. GSU has no further comments.